INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Part 70 Operating Permit

for BrickCraft, Inc. in Clay County

Part 70 Operating Permit Renewal No.: T021-42808-00054

The Indiana Department of Environmental Management (IDEM) has received an application from BrickCraft, Inc. located at 200 North SR 59, Center Point, Indiana 47840 for a renewal of its Part 70 Operating Permit issued on January 27, 2016. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow BrickCraft, Inc. to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM's preliminary findings have been sent to:

Clay County Genealogy Library
309 Main Street
Center Point, IN 47840

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM's website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T 021-43808-00054 in all correspondence.

Comments should be sent to:

Andrea Smith
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Andrea Smith or (317) 234-6543
Or dial directly: (317) 234-6543
Fax: (317) 232-6749 attn: acsmith@idem.in.us
E-mail: acsmith@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Andrea Smith of my staff at the above address.

Brian Williams, Section Chief
Permits Branch
Office of Air Quality

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DRAFT

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

BrickCraft, Inc.
200 North SR 59
Center Point, Indiana 47840

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: 021-42808-00054 Master Agency Interest ID: 6253	
Issued by: Brian Willams, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary brick manufacturing plant.

Source Address:	200 North SR 59, Center Point, Indiana 47840
General Source Phone Number:	812-835-2502
SIC Code:	3251 (Brick and Structural Clay Tile)
County Location:	Clay
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) quarry, constructed in 2004, with a capacity of 125 tons of shale per hour;

(b) Three (3) outdoor aggregate storage piles, with a combined capacity of 125 tons of shale per hour.

(c) One (1) pre-kiln clay/shale/fireclay/sand processing operation, identified as EU-02, constructed in 2004, with a maximum capacity of 125 tons of raw material (including clay, fireclay, shale, and sand) per hour, consisting of the following equipment:

(1) One (1) primary crusher, with a maximum capacity of 125 tons of raw material per hour, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(2) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(3) One (1) grinding and scalping screen operation, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(4) One (1) coarse material return conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(5) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(6) One (1) secondary crusher, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(7) One (1) transfer conveyor, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(8) One (1) finishing screen operation, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(9) One (1) coarse material return conveyor, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(10) Two (2) transfer conveyors, each with a maximum capacity of 70 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(11) Six (6) crushed material storage bins, each having a capacity of 100 tons, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(12) Two (2) transfer conveyors, each with a maximum capacity of 60 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally;

(13) One (1) enclosed mixing pugmill, with a maximum capacity of 60 tons per hour, using baghouse BH-2 as particulate control, exhausting internally;

(14) One (1) transfer conveyor, with a maximum capacity of 60 tons of milled material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally; and

(15) One (1) extrusion operation, with a maximum capacity of 60 tons of milled material per hour, with emissions uncontrolled.

(d) One (1) brick manufacturing line, identified as EU-01, with a maximum capacity of 10 tons of bricks per hour, consisting of:

(1) One (1) brick dryer, constructed in 2004, with a maximum capacity of 10 tons of bricks per hour, using recycled hot air from the gas-fired kiln, exhausting through stacks D-1 and CZ-1;

(2) One (1) natural gas-fired tunnel kiln, constructed in 2004, rated at 56 million British thermal units per hour, with a maximum capacity of 10 tons of bricks per hour, using a dry injection fabric filter (DIFF) as a control device for both hydrogen fluoride and sulfur dioxide, exhausting through stacks POC-1 and UCC-1;

(3) One (1) lime storage silo, identified as Lime Silo, constructed in 2009, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF); and

(4) One (1) sodium bicarbonate storage silo, identified as Bicarb Silo, constructed in 2004, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF).

(e) One (1) outdoor spent injection material storage pile, with a capacity of 185 pounds of lime/sodium bicarbonate mixture per hour.

A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, as follows:

Three (3) torpedo heaters, with no unit identification, each with a heat input capacity of 1.70 MMBtu per hour.

(b) Paved and unpaved roads.

A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Combustion source flame safety purging on start-up.

(b) Petroleum fuel (other than gasoline) dispensing facilities, having storage capacity of less than or equal to 10,500 gallons and dispensing less than or equal to 230,000 gallons per month:

(1) One (1) storage tank, constructed in 2004, identified as Main, for storage of diesel fuel, with a maximum volume of 1,000 gallons; and

(2) One (1) storage tank, constructed in 2004, identified as Quarry, for storage of diesel fuel, with a maximum volume of 2,000 gallons.

(c) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(d) Refractory storage not requiring air pollution control equipment.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(f) A laboratory as defined in 326 IAC 2-7-1(20)(C).

(g) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day PM_{10}, SO_2, or NO_x; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):

(1) One (1) additive feeder, with a maximum capacity of six (6) tons per hour, using baghouse BH-1 as particulate control, exhausting internally;

(2) One (1) enclosed surge bin, with a maximum capacity of 20 tons, using baghouse BH-1 as particulate control, exhausting internally;

(3) One (1) texture feeder, with a maximum capacity of 0.25 tons per hour, using baghouse BH-2 as particulate control, exhausting internally; and

(4) One (1) packaging area, with a maximum capacity of 38 tons per hour, using baghouse BH-2 as particulate control, exhausting internally.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, 021-42808-00054, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance

causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable

requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to 021-42808-00054 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

(I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

(II)

(a) CAM *Response to excursions or exceedances.*

(1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

(1) Failed to address the cause of the control device performance problems; or

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) *CAM recordkeeping requirements.*

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a

"responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

(1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Aggregate Processing

(c) One (1) pre-kiln clay/shale/fireclay/sand processing operation, identified as EU-02, constructed in 2004, with a maximum capacity of 125 tons of raw material (including clay, fireclay, shale, and sand) per hour, consisting of the following equipment:

(1) One (1) primary crusher, with a maximum capacity of 125 tons of raw material per hour, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(2) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(3) One (1) grinding and scalping screen operation, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(4) One (1) coarse material return conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(5) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(6) One (1) secondary crusher, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(7) One (1) transfer conveyor, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(8) One (1) finishing screen operation, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(9) One (1) coarse material return conveyor, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(10) Two (2) transfer conveyors, each with a maximum capacity of 70 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control,

exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(11) Six (6) crushed material storage bins, each having a capacity of 100 tons, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(12) Two (2) transfer conveyors, each with a maximum capacity of 60 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally;

(13) One (1) enclosed mixing pugmill, with a maximum capacity of 60 tons per hour, using baghouse BH-2 as particulate control, exhausting internally;

(14) One (1) transfer conveyor, with a maximum capacity of 60 tons of milled material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally; and

(15) One (1) extrusion operation, with a maximum capacity of 60 tons of milled material per hour, with emissions uncontrolled.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from emission units shall not exceed allowable particulate emissions when operating at a maximum process weight rate as specified in the table below.

The pounds per hour limitations were calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour

The allowable emissions for each facility operating at its maximum process weight rate are as follows:

Emission Unit ID	Process Weight (tons/hr)	Allowable Particulate Emissions (lb/hr)
Primary Crusher	125	53.55
Grinding and Scalping Screen Operation	125	53.55
Secondary Crusher	110	52.24
Finishing Screen Operation	110	52.24
Pugmill	60	46.29
Extrusion Operation	60	46.29

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these units and the associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Brick Manufacturing

(d) One (1) brick manufacturing line, identified as EU-01, with a maximum capacity of 10 tons of bricks per hour, consisting of:

(1) One (1) brick dryer, constructed in 2004, with a maximum capacity of 10 tons of bricks per hour, using recycled hot air from the gas-fired kiln, exhausting through stacks D-1 and CZ-1;

(2) One (1) natural gas-fired tunnel kiln, constructed in 2004, rated at 56 million British thermal units per hour, with a maximum capacity of 10 tons of bricks per hour, using a dry injection fabric filter (DIFF) as a control device for both hydrogen fluoride and sulfur dioxide, exhausting through stacks POC-1 and UCC-1;

(3) One (1) lime storage silo, identified as Lime Silo, constructed in 2009, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF); and

(4) One (1) sodium bicarbonate storage silo, identified as Bicarb Silo, constructed in 2004, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF).

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limits [326 IAC 2-2]

(a) The total PM emissions from the tunnel kiln, lime silo, and sodium bicarbonate silo shall not exceed 5.0 pounds per hour.

(b) The total PM_{10} emissions from the tunnel kiln, lime silo, and sodium bicarbonate silo shall not exceed 35.0 pounds per hour.

(c) The total $PM_{2.5}$ emissions from the tunnel kiln, lime silo, and sodium bicarbonate silo shall not exceed 35.0 pounds per hour.

(d) The SO_2 emissions from the dry injection fabric filter (DIFF) controlling the tunnel kiln, lime silo, and sodium bicarbonate silo shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(e) The total Fluoride emissions from the tunnel kiln, lime silo, and sodium bicarbonate silo shall not exceed 5.30 pounds per hour when the DIFF is in operation.

(f) The dry injection fabric filter (DIFF) for PM, PM_{10}, and $PM_{2.5}$ control shall be in operation and control emissions from the lime silo and sodium bicarbonate silo at all times that either of the silos are being loaded.

(g) The dry injection fabric filter (DIFF) for SO_2 and total Fluoride control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

Compliance with these limits, combined with the potential to emit from other units at the source, shall limit the source-wide total potential to emit total Fluorides to less than 25 tons per twelve (12) consecutive month period and PM, PM_{10}, $PM_{2.5}$, and SO_2 to less than 250 tons per twelve (12) consecutive month period, each and shall renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.2 HAP Minor Limits [326 IAC 2-4.1][40 CFR 63.1]

(a) The HF emissions from the dry injection fabric filter (DIFF) controlling the tunnel kiln, lime silo, and sodium bicarbonate silo shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The dry injection fabric filter (DIFF) for HF control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

Compliance with these limits, combined with the potential to emit from other units at the source, shall limit the source-wide total potential to emit HF to less than 10 tons per twelve (12) consecutive month period and shall renders the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and this source is an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

D.2.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from emission units shall not exceed allowable particulate emissions when operating at a maximum process weight rate as specified in the table below.

The pounds per hour limitations were calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour

The allowable emissions for each facility operating at its maximum process weight rate are as follows:

Emission Unit ID	Process Weight (tons/hr)	Allowable Particulate Emissions (lb/hr)
Brick Dryer	10	19.18
Tunnel Kiln	10	19.18
Lime Storage Silo - Receiving	25	35.43
Bicarbonate Storage Silo - Receiving	25	35.43

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these units and the associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-7-1]

D.2.5 Emissions Control

(a) In order to comply with Conditions D.2.1(a), D.2.1(b), and D.2.1(c) , the dry injection fabric filter (DIFF) for particulate control shall be in operation and control emissions from the lime silo and sodium bicarbonate silo at all times that either of the silos are being loaded.

(b) In order to comply with Condition D.2.1(e), the dry injection fabric filter (DIFF) for total Fluoride control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

(c) When determining compliance with Conditions D.2.1(d) and D.2.2(a) without the use of a CEMS, the dry injection fabric filter (DIFF) for SO_2 and HF control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

(d) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Condition D.2.1(c) without the use of a CEMS, the Permittee shall perform SO_2 testing of the dry injection fabric filter (DIFF) controlling the tunnel kiln utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

(b) In order to demonstrate compliance with Condition 2.2(a) without the use of a CEMS, the Permittee shall perform HF testing of the dry injection fabric filter (DIFF) controlling the tunnel kiln utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.2.7 Sulfur Dioxide (SO2)

In order to determine compliance with the SO_2 emissions limit in Condition D.2.1(d), the SO_2 emissions from the tunnel kiln shall be calculated using the following formula:

$$E_{TOTAL} = E_{CEMS} + [(C \times EF_{DIFF} \times H_{DIFF} / 2000) + (C \times EF_{NON\text{-}DIFF} \times H_{NON\text{-}DIFF} / 2000)]$$

where:

E_{TOTAL} = combined total tons of SO_2 emissions per month
E_{CEMS} = total tons of SO_2 emissions per month from the tunnel kiln, as determined with the CEMS output

C = average hourly throughput of the tunnel kiln for the month defined by H_{DIFF} and $H_{NON-DIFF}$

EF_{DIFF} = SO_2 emission factor from the tunnel kiln when controlled by the DIFF, which equals 5.41 lb/ton or the most recent valid compliance demonstration

H_{DIFF} = total number of hours per month the tunnel kiln was controlled by the DIFF when the CEMS is not used to measure SO_2

2000 = lb/ton

$EF_{NON-DIFF}$ = SO_2 emission factor from the tunnel kiln when bypassing the DIFF, which equals 25.0 lb/ton or the most recent valid compliance demonstration

$H_{NON-DIFF}$ = total number of hours per month the tunnel kiln bypassed the DIFF when the CEMS is not used to measure SO_2

D.2.8 Hydrogen Fluoride/Hydrofluoric Acid (HF)

In order to determine compliance with the HF emissions limit in Condition D.2.2(a), the HF emissions from the tunnel kiln shall be calculated using the following formula:

$$E_{TOTAL} = E_{CEMS} + [(C \times EF_{DIFF} \times H_{DIFF} / 2000) + (C \times EF_{NON-DIFF} \times H_{NON-DIFF} / 2000)]$$

where:

E_{TOTAL} = combined total tons of HF emissions per month

E_{CEMS} = total tons of HF emissions per month from the tunnel kiln, as determined with the CEMS output

C = average hourly throughput of the tunnel kiln for the month defined by H_{DIFF} and $H_{NON-DIFF}$

EF_{DIFF} = HF emission factor from the tunnel kiln when controlled by the DIFF, which equals 0.22 lb/ton or the most recent valid compliance demonstration

H_{DIFF} = total number of hours per month the tunnel kiln was controlled by the DIFF when the CEMS is not used to measure HF

2000 = lb/ton

$EF_{NON-DIFF}$ = HF emission factor from the tunnel kiln when bypassing the DIFF, which equals 0.37 lb/ton or the most recent valid compliance demonstration

$H_{NON-DIFF}$ = total number of hours per month the tunnel kiln bypassed the DIFF when the CEMS is not used to measure HF

D.2.9 Sulfur Content

In order to determine compliance with Condition D.2.1(d) when determining compliance without the use of a CEMS, the Permittee shall demonstrate that the sulfur dioxide emissions from the tunnel kiln does not exceed 25.00 pounds per ton of fired product. Compliance shall be determined utilizing one of the following options:

(a) Sampling and analyzing the aggregate feedstock by using the following procedures:

(1) The aggregate sample acquisition point shall be at a location where representative samples of the feedstock to be consumed by the facility may be obtained;

(2) The aggregate shall be sampled at least one (1) time per day;

(3) Minimum sample size shall be five hundred (500) grams;

(4) Samples shall be composited and analyzed at the end of each calendar quarter;

(5) Sulfur content analysis shall be determined by an independent laboratory; or

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the tunnel kiln, using 40 CFR 60, Appendix A, Method 6, which is conducted with such frequency as to generate the amount of information required by (a) above.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.2.10 Continuous Emission Monitoring [326 IAC 3-5][326 IAC 2-7-6(1), (6)][326 IAC 2-1.1-11][326 IAC 2-7-5(3)(A)(iii)][40 CFR 64]

(a) In order to determine compliance with Conditions D.2.1(d) and D.2.2(a) when determining compliance with the use of a CEMS, the Permittee shall maintain, calibrate, and operate a continuous emission monitoring system (CEMS) and related equipment for measuring SO_2 and HF emissions from the tunnel kiln in accordance with 326 IAC 3-5.

(b) The SO_2 and HF CEMS shall be operated at all times the tunnel kiln is in operation except for system breakdowns, repairs, calibration checks, and zero and span adjustments.

(c) All continuous emissions monitoring systems are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.

(d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a CEMS pursuant to 326 IAC 3-5.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.2.11 SO2 and HF Monitor Downtime

When determining compliance with Conditions D.2.1(d) and D.2.2(a) with the use of a CEMS, whenever the CEMS is down for more than twenty-four (24) hours, a calibrated backup CEMS shall be brought online within twenty-four (24) hours of shutdown of the primary CEMS, if possible. If this is not possible, the requirements in Condition D.2.14(b) shall be conducted to allow for determination of compliance with the SO_2 and HF emission limits.

D.2.12 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the dry injection fabric filter (DIFF) at least once per day when any of the tunnel kiln, lime silo, and sodium bicarbonate silo units are in operation. When, for any one reading, the pressure drop across a DIFF is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 1.0 and 7.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instruments used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months or other time period specified by the manufacturer. The Permittee shall maintain records of the manufacturer specifications, if used.

D.2.13 SO2 Compliance Assurance Monitoring [40 CFR 64]

Pursuant to 326 IAC 2 7 5(1), 326 IAC 2 7 6(1), and 40 CFR 64 (CAM):

(a) When determining compliance with the use of a CEMS, the Permittee shall operate a CEMS. When the CEMS is not operating, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that indicates the CEMS is not operating is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(b) When determining compliance without the use of a CEMS:

(1) The Permittee shall monitor the dry lime feed rate from the lime silo to the dry injection fabric filter (DIFF) continuously. When the dry lime feed rate is below 12% motor output speed (equivalent to 125 pounds per hour) or a rate established during the latest performance test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is below the above mentioned rate is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(2) The Permittee shall monitor the dry sodium bicarbonate feed rate from the sodium bicarbonate silo to the dry injection fabric filter (DIFF) continuously. When the dry sodium bicarbonate feed rate is below 11% motor output speed (equivalent to 60 pounds per hour) or a rate established during the latest performance test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is below the above mentioned rate is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(3) The Permittee shall inspect the dry lime feed system and the feed quantity on the lime silo once per day. If the lime feed quantity drops below the level established during the latest performance test or runs out, the switches and/or level sensors monitoring the interlock system on the limestone delivery systems (including the lime screw conveyor and holding bin) are not functioning properly, or the Permittee discovers cracks, holes, or abnormal/excessive wear on the indicators for the screw conveyor and holding bin, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A feed quantity that is below the level established during the latest performance test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(4) The Permittee shall inspect the dry sodium bicarbonate feed system and the feed quantity on the sodium bicarbonate silo once per day. If the sodium bicarbonate feeder setting drops below the level established during the latest performance test or runs out, the switches and/or level sensors monitoring the interlock system on the sodium bicarbonate delivery systems, including the sodium bicarbonate screw conveyor and holding bin, are not functioning properly, or the Permittee discovers cracks, holes, or abnormal/excessive wear on the indicators for the screw conveyor and holding bin, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by

this condition. A feed quantity that is below the level established during the latest performance test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.2.14 HF Compliance Monitoring [40 CFR 64]

(a) When determining compliance with the use of a CEMS, the Permittee shall operate a CEMS. When the CEMS is not operating, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that indicates the CEMS is not operating is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(b) When determining compliance without the use of a CEMS:

(1) The Permittee shall monitor the dry lime feed rate from the lime silo to the dry injection fabric filter (DIFF) once per day. When the dry lime feed rate is below 12% motor output speed (equivalent to 125 pounds per hour) or a rate established during the latest performance test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is below the above mentioned rate is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(2) The Permittee shall monitor the dry sodium bicarbonate feed rate from the sodium bicarbonate silo to the dry injection fabric filter (DIFF) once per day. When the dry sodium bicarbonate feed rate is below 11% motor output speed (equivalent to 60 pounds per hour) or a rate established during the latest performance test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is below the above mentioned rate is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(3) The Permittee shall inspect the dry lime feed system and the feed quantity on the lime silo once per day. If the lime feed quantity drops below the level established during the latest performance test or runs out, the switches and/or level sensors monitoring the interlock system on the limestone delivery systems (including the lime screw conveyor and holding bin) are not functioning properly, or the Permittee discovers cracks, holes, or abnormal/excessive wear on the indicators for the screw conveyor and holding bin, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A feed quantity that is below the level established during the latest performance test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(4) The Permittee shall inspect the dry sodium bicarbonate feed system and the feed quantity on the sodium bicarbonate silo once per day. If the sodium bicarbonate feeder setting drops below the level established during the latest performance test or runs out, the switches and/or level sensors monitoring the interlock system on the sodium bicarbonate delivery systems, including the sodium bicarbonate screw conveyor and holding bin, are not functioning properly, or the Permittee discovers cracks, holes, or abnormal/excessive wear on the indicators for the screw conveyor and holding bin, the Permittee shall take reasonable

response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A feed quantity that is below the level established during the latest performance test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.2.15 Broken or Failed Bag Detection

In the event that failure of the dry injection fabric filter (DIFF) has been observed:

(a) For a single compartment baghouse controlling emissions from a process operated continuously, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces, or triboflows.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.2.16 Record Keeping Requirements

(a) To document the compliance status with Conditions D.2.1(g) and D.2.2(b), the Permittee shall maintain monthly records of the amount of time the dry injection fabric filter (DIFF) was bypassed.

(b) To document the compliance status with Conditions D.2.1 and D.2.9, the Permittee shall maintain records in accordance with (1) through (3) below:

(1) Calendar dates covered in the compliance determination period;

(2) Sulfur content of the aggregate feedstock; and

(3) Sulfur dioxide emission rates.

Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the emission limits established in Condition D.2.1.

(c) To document the compliance status with Condition D.2.10, the Permittee shall maintain records of the SO_2 and HF CEMS output. Records shall be complete and sufficient to establish compliance with the SO_2 and HF limits in Conditions D.2.1(d) and D.2.2(b) on a monthly basis.

(d) To document the compliance status with Condition D.2.11, the Permittee shall maintain the following information, recorded during periods of SO_2 and HF CEMS downtime:

(1) Calendar dates and beginning and ending times of CEMS downtime during the compliance determination period;

(2) Actual aggregate sulfur content, during CEMS downtime; and

(3) Documentation of the emission rate of SO_2 and HF, as determined in accordance with Conditions D.2.10 and D.2.11.

(e) To document the compliance status with Conditions D.2.12, D.2.13, and D.2.16, the Permittee shall maintain records once per day of the pressure drop and feed quantity readings. The Permittee shall include in its daily record when a pressure drop reading or feed quantity reading is not taken and the reason for the lack of pressure drop reading or feed quantity reading (e.g., the process did not operate that day).

(f) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.2.17 Reporting Requirements

(a) A quarterly report of tons of SO_2 emissions to document the compliance status with Condition D.2.1(d) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(b) A quarterly report of tons of HF emissions to document the compliance status with Condition D.2.2(a) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(c) A quarterly report of hours of operation when bypassing the DIFF to document the compliance status with Conditions D.2.1(g) and D.2.2(b) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

SECTION E.1 NSPS

Emissions Unit Description: Aggregate Processing

(c) One (1) pre-kiln clay/shale/fireclay/sand processing operation, identified as EU-02, installed in 2004, with a maximum capacity of 125 tons of raw material (including clay, fireclay, shale, and sand) per hour, consisting of the following equipment:

(1) One (1) primary crusher, with a maximum capacity of 125 tons of raw material per hour, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(2) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(3) One (1) grinding and scalping screen operation, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(4) One (1) coarse material return conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(5) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(6) One (1) secondary crusher, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(7) One (1) transfer conveyor, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(8) One (1) finishing screen operation, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(9) One (1) coarse material return conveyor, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(10) Two (2) transfer conveyors, each with a maximum capacity of 70 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control,

exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(11) Six (6) crushed material storage bins, each having a capacity of 100 tons, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart OOO.

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.1.2 Nonmetallic Mineral Processing Plants NSPS [326 IAC 12] [40 CFR Part 60, Subpart OOO]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart OOO (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

(1) 40 CFR 60.670 (a)(1), (d), (e), (f);
(2) 40 CFR 60.671;
(3) 40 CFR 60.672 (b), (d), (e)(1), (f);
(4) 40 CFR 60.673;
(5) 40 CFR 60.675 (a), (c)(1)(i), (c)(1)(ii), (c)(2), (c)(3), (d)(2), (e), (g), (i);
(6) 40 CFR 60.676 (a), (f), (h), (i)(1), (j), (k);
(7) Table 1 to 40 CFR 63, Subpart OOO; and
(8) Table 3 to 40 CFR 63, Subpart OOO.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: BrickCraft Inc.
Source Address: 200 North SR 59, Center Point, Indiana 47840
Part 70 Permit No.: 021-42808-00054

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) _____

☐ Report (specify) _____

☐ Notification (specify) _____

☐ Affidavit (specify) _____

☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: BrickCraft, Inc.
Source Address: 200 North SR 59, Center Point, Indiana 47840
Part 70 Permit No.: 021-42808-00054

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone:_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: BrickCraft, Inc.
Source Address: 200 North SR 59, Center Point, Indiana 47840
Part 70 Permit No.: T021-42808-00054
Facility: Dry injection fabric filter (DIFF) controlling the tunnel kiln, lime silo, and sodium bicarbonate silo
Parameter: SO_2 emissions
Limit: Not to exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER : YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: BrickCraft, Inc.
Source Address: 200 North SR 59, Center Point, Indiana 47840
Part 70 Permit No.: T021-42808-00054
Facility: Dry injection fabric filter (DIFF) controlling the tunnel kiln, lime silo, and sodium bicarbonate silo
Parameter: HF emissions
Limit: Not be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER : YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: BrickCraft, Inc.
Source Address: 200 North SR 59, Center Point, Indiana 47840
Part 70 Permit No.: T021-42808-00054
Facility: Dry injection fabric filter (DIFF) controlling the tunnel kiln, lime silo, and sodium bicarbonate silo
Parameter: Number of hours the DIFF may be bypassed (for routine maintenance)
Limit: Maximum of 125 hours per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER : YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: BrickCraft, Inc.
Source Address: 200 North SR 59, Center Point, Indiana 47840
Part 70 Permit No.: T021-42808-00054

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

ATTACHMENT A

FUGITIVE DUST CONTROL PLAN

BRICKCRAFT
200 NORTH SR 59
CENTER POINT, IN 47840

(a) Fugitive particulate matter (dust) emissions from unpaved roads and gravel areas shall be controlled by one or more of the following measures:

(1) Unpaved roads and gravel areas:

(A) Application of water on an as needed basis

(b) Fugitive particulate matter (dust) emissions from aggregate stockpiles shall be controlled by one or more of the following measures:

(1) Maintain minimum size and number of stock piles of aggregate.
(2) Treating around the stockpile area with water on an as needed basis.
(3) Treating the stockpiles with water on an as needed basis.

(c) Fugitive particulate matter (dust) emissions from outdoor conveying of aggregates shall be controlled by one or more of the following measures:

(1) Apply water at the feed and the intermediate points on an as needed basis.

(d) Fugitive particulate matter (dust) emissions from the transferring of aggregates shall be controlled by one or more of the following measures:

(1) Minimize the vehicular distance between the transfer points.
(2) Enclose the transfer points.
(3) Apply water on transfer points on an as needed basis.

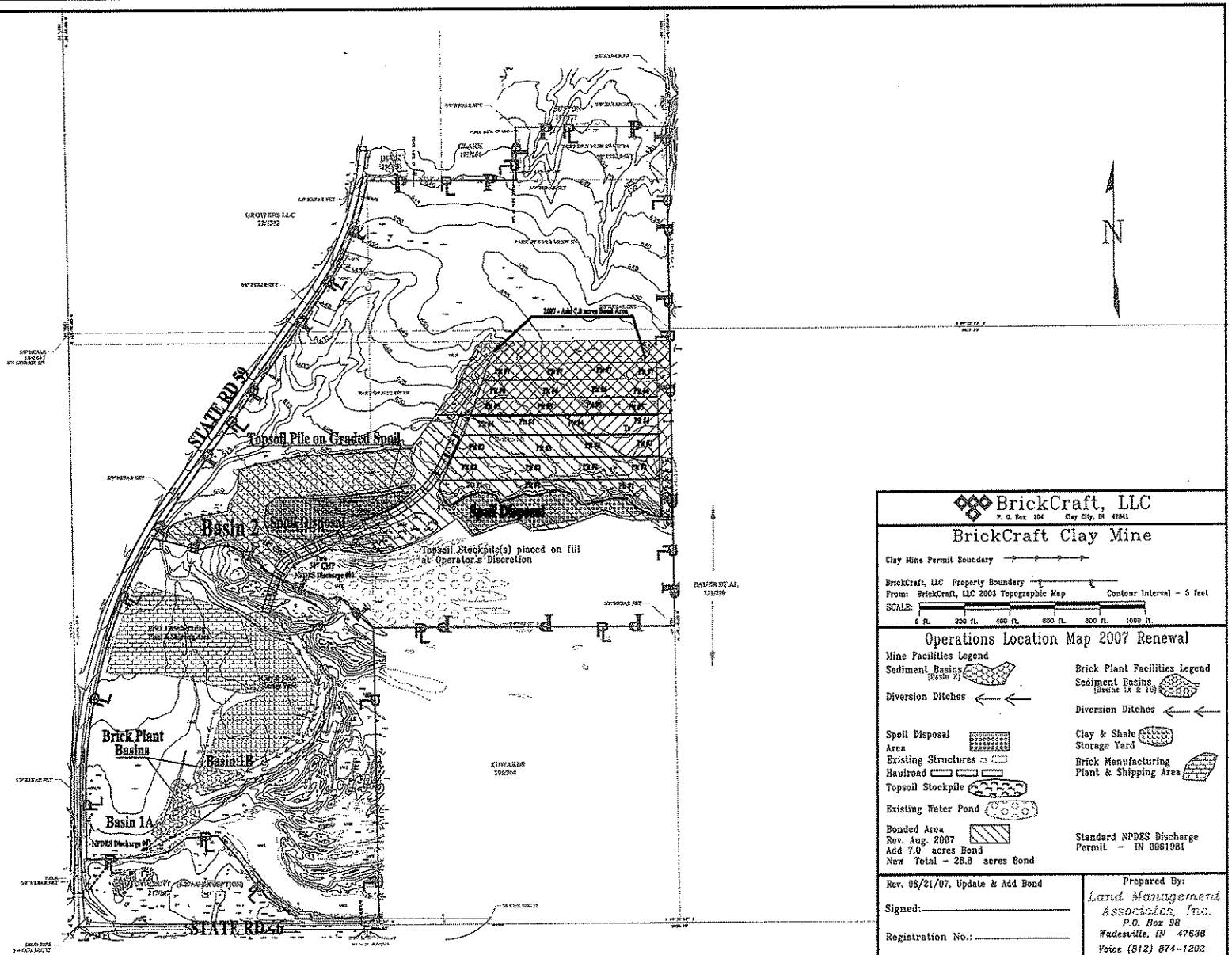
(e) Fugitive particulate matter (dust) emissions from transporting of aggregate by truck, front end loader, etc. shall be controlled by one or more of the following measures:

(1) Tarping the aggregate hauling vehicles.
(2) Maintain vehicle bodies in a condition to prevent leakage.
(3) Spray the aggregates with water.
(4) Maintain a 10 mile per hour (MPH) speed limit in the yard.

(f) Fugitive particulate matter (dust) emissions from the loading and unloading of aggregate shall be controlled by one or more of the following measures:

(1) Reduce free fall distance to a minimum.
(2) Reduce the rate of discharge of the aggregate.
(3) Spray the aggregate with water on an as needed basis.

"An as needed basis" means the frequency or quantity of application necessary to minimize visible particulate matter emissions.



BrickCraft, LLC
P. O. Box 104 Clay City, IN 47841

BrickCraft Clay Mine

Clay Mine Permit Boundary

BrickCraft, LLC Property Boundary

From: BrickCraft, LLC 2003 Topographic Map Contour Interval = 5 feet

SCALE: 0 ft. 200 ft. 400 ft. 600 ft. 800 ft. 1000 ft.

Operations Location Map 2007 Renewal

Mine Facilities Legend

- Sediment Basins (Basin 2)
- Diversion Ditches
- Spoil Disposal Area
- Existing Structures
- Haulroad
- Topsoil Stockpile
- Existing Water Pond
- Bonded Area Rev. Aug. 2007 Add 7.0 acres Bond New Total = 28.8 acres Bond

Brick Plant Facilities Legend

- Sediment Basins (Basins 1A & 1B)
- Diversion Ditches
- Clay & Shale Storage Yard
- Brick Manufacturing Plant & Shipping Area

Standard NPDES Discharge Permit - IN 0061981

Rev. 08/21/07, Update & Add Bond

Signed: _____

Registration No.: _____

Date: _____

Prepared By:
Land Management Associates, Inc.
P.O. Box 98
Wadesville, IN 47638
Voice (812) 874-1202
FAX (812) 874-1205

Attachment B

Part 70 Operating Permit No: T021-42808-00054

[Downloaded from the eCFR on May 13, 2013]

Electronic Code of Federal Regulations

Title 40: Protection of Environment

PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

Subpart OOO—Standards of Performance for Nonmetallic Mineral Processing Plants

Source: 74 FR 19309, Apr. 28, 2009, unless otherwise noted.

§ 60.670 Applicability and designation of affected facility.

(a)(1) Except as provided in paragraphs (a)(2), (b), (c), and (d) of this section, the provisions of this subpart are applicable to the following affected facilities in fixed or portable nonmetallic mineral processing plants: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station. Also, crushers and grinding mills at hot mix asphalt facilities that reduce the size of nonmetallic minerals embedded in recycled asphalt pavement and subsequent affected facilities up to, but not including, the first storage silo or bin are subject to the provisions of this subpart.

(2) The provisions of this subpart do not apply to the following operations: All facilities located in underground mines; plants without crushers or grinding mills above ground; and wet material processing operations (as defined in § 60.671).

(b) An affected facility that is subject to the provisions of subparts F or I of this part or that follows in the plant process any facility subject to the provisions of subparts F or I of this part is not subject to the provisions of this subpart.

(c) Facilities at the following plants are not subject to the provisions of this subpart:

(1) Fixed sand and gravel plants and crushed stone plants with capacities, as defined in § 60.671, of 23 megagrams per hour (25 tons per hour) or less;

(2) Portable sand and gravel plants and crushed stone plants with capacities, as defined in § 60.671, of 136 megagrams per hour (150 tons per hour) or less; and

(3) Common clay plants and pumice plants with capacities, as defined in § 60.671, of 9 megagrams per hour (10 tons per hour) or less.

(d)(1) When an existing facility is replaced by a piece of equipment of equal or smaller size, as defined in § 60.671, having the same function as the existing facility, and there is no increase in the amount of emissions, the new facility is exempt from the provisions of §§ 60.672, 60.674, and 60.675 except as provided for in paragraph (d)(3) of this section.

(2) An owner or operator complying with paragraph (d)(1) of this section shall submit the information required in § 60.676(a).

(3) An owner or operator replacing all existing facilities in a production line with new facilities does not qualify for the exemption described in paragraph (d)(1) of this section and must comply with the provisions of §§ 60.672, 60.674 and 60.675.

(e) An affected facility under paragraph (a) of this section that commences construction, modification, or reconstruction after August 31, 1983, is subject to the requirements of this part.

(f) Table 1 of this subpart specifies the provisions of subpart A of this part 60 that do not apply to owners and operators of affected facilities subject to this subpart or that apply with certain exceptions.

§ 60.671 Definitions.

All terms used in this subpart, but not specifically defined in this section, shall have the meaning given them in the Act and in subpart A of this part.

Bagging operation means the mechanical process by which bags are filled with nonmetallic minerals.

Belt conveyor means a conveying device that transports material from one location to another by means of an endless belt that is carried on a series of idlers and routed around a pulley at each end.

Bucket elevator means a conveying device of nonmetallic minerals consisting of a head and foot assembly which supports and drives an endless single or double strand chain or belt to which buckets are attached.

Building means any frame structure with a roof.

Capacity means the cumulative rated capacity of all initial crushers that are part of the plant.

Capture system means the equipment (including enclosures, hoods, ducts, fans, dampers, etc.) used to capture and transport particulate matter generated by one or more affected facilities to a control device.

Control device means the air pollution control equipment used to reduce particulate matter emissions released to the atmosphere from one or more affected facilities at a nonmetallic mineral processing plant.

Conveying system means a device for transporting materials from one piece of equipment or location to another location within a plant. Conveying systems include but are not limited to the following: Feeders, belt conveyors, bucket elevators and pneumatic systems.

Crush or *Crushing* means to reduce the size of nonmetallic mineral material by means of physical impaction of the crusher or grinding mill upon the material.

Crusher means a machine used to crush any nonmetallic minerals, and includes, but is not limited to, the following types: Jaw, gyratory, cone, roll, rod mill, hammermill, and impactor.

Enclosed truck or railcar loading station means that portion of a nonmetallic mineral processing plant where nonmetallic minerals are loaded by an enclosed conveying system into enclosed trucks or railcars.

Fixed plant means any nonmetallic mineral processing plant at which the processing equipment specified in § 60.670(a) is attached by a cable, chain, turnbuckle, bolt or other means (except electrical connections) to any anchor, slab, or structure including bedrock.

Fugitive emission means particulate matter that is not collected by a capture system and is released to the atmosphere at the point of generation.

Grinding mill means a machine used for the wet or dry fine crushing of any nonmetallic mineral. Grinding mills include, but are not limited to, the following types: Hammer, roller, rod, pebble and ball, and fluid energy. The grinding mill includes the air conveying system, air separator, or air classifier, where such systems are used.

Initial crusher means any crusher into which nonmetallic minerals can be fed without prior crushing in the plant.

Nonmetallic mineral means any of the following minerals or any mixture of which the majority is any of the following minerals:

(1) Crushed and Broken Stone, including Limestone, Dolomite, Granite, Traprock, Sandstone, Quartz, Quartzite, Marl, Marble, Slate, Shale, Oil Shale, and Shell.

(2) Sand and Gravel.

(3) Clay including Kaolin, Fireclay, Bentonite, Fuller's Earth, Ball Clay, and Common Clay.

(4) Rock Salt.

(5) Gypsum (natural or synthetic).

(6) Sodium Compounds, including Sodium Carbonate, Sodium Chloride, and Sodium Sulfate.

(7) Pumice.

(8) Gilsonite.

(9) Talc and Pyrophyllite.

(10) Boron, including Borax, Kernite, and Colemanite.

(11) Barite.

(12) Fluorospar.

(13) Feldspar.

(14) Diatomite.

(15) Perlite.

(16) Vermiculite.

(17) Mica.

(18) Kyanite, including Andalusite, Sillimanite, Topaz, and Dumortierite.

Nonmetallic mineral processing plant means any combination of equipment that is used to crush or grind any nonmetallic mineral wherever located, including lime plants, power plants, steel mills, asphalt concrete plants, portland cement plants, or any other facility processing nonmetallic minerals except as provided in § 60.670 (b) and (c).

Portable plant means any nonmetallic mineral processing plant that is mounted on any chassis or skids and may be moved by the application of a lifting or pulling force. In addition, there shall be no cable, chain, turnbuckle, bolt or other means (except electrical connections) by which any piece of equipment is attached or clamped to any anchor, slab, or structure, including bedrock that must be removed prior to the application of a lifting or pulling force for the purpose of transporting the unit.

Production line means all affected facilities (crushers, grinding mills, screening operations, bucket elevators, belt conveyors, bagging operations, storage bins, and enclosed truck and railcar loading stations) which are directly connected or are connected together by a conveying system.

Saturated material means, for purposes of this subpart, mineral material with sufficient surface moisture such that particulate matter emissions are not generated from processing of the material through screening operations, bucket elevators and belt conveyors. Material that is wetted solely by wet suppression systems is not considered to be "saturated" for purposes of this definition.

Screening operation means a device for separating material according to size by passing undersize material through one or more mesh surfaces (screens) in series, and retaining oversize material on the mesh surfaces (screens). Grizzly feeders associated with truck dumping and static (non-moving) grizzlies used anywhere in the nonmetallic mineral processing plant are not considered to be screening operations.

Seasonal shut down means shut down of an affected facility for a period of at least 45 consecutive days due to weather or seasonal market conditions.

Size means the rated capacity in tons per hour of a crusher, grinding mill, bucket elevator, bagging operation, or enclosed truck or railcar loading station; the total surface area of the top screen of a screening operation; the width of a conveyor belt; and the rated capacity in tons of a storage bin.

Stack emission means the particulate matter that is released to the atmosphere from a capture system.

Storage bin means a facility for storage (including surge bins) of nonmetallic minerals prior to further processing or loading.

Transfer point means a point in a conveying operation where the nonmetallic mineral is transferred to or from a belt conveyor except where the nonmetallic mineral is being transferred to a stockpile.

Truck dumping means the unloading of nonmetallic minerals from movable vehicles designed to transport nonmetallic minerals from one location to another. Movable vehicles include but are not limited to: Trucks, front end loaders, skip hoists, and railcars.

Vent means an opening through which there is mechanically induced air flow for the purpose of exhausting from a building air carrying particulate matter emissions from one or more affected facilities.

Wet material processing operation(s) means any of the following:

(1) Wet screening operations (as defined in this section) and subsequent screening operations, bucket elevators and belt conveyors in the production line that process saturated materials (as defined in this section) up to the first crusher, grinding mill or storage bin in the production line; or

(2) Screening operations, bucket elevators and belt conveyors in the production line downstream of wet mining operations (as defined in this section) that process saturated materials (as defined in this section) up to the first crusher, grinding mill or storage bin in the production line.

Wet mining operation means a mining or dredging operation designed and operated to extract any nonmetallic mineral regulated under this subpart from deposits existing at or below the water table, where the nonmetallic mineral is saturated with water.

Wet screening operation means a screening operation at a nonmetallic mineral processing plant which removes unwanted material or which separates marketable fines from the product by a washing process which is designed and operated at all times such that the product is saturated with water.

§ 60.672 Standard for particulate matter (PM).

(a) Affected facilities must meet the stack emission limits and compliance requirements in Table 2 of this subpart within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under § 60.8. The requirements in Table 2 of this subpart apply for affected facilities with capture systems used to capture and transport particulate matter to a control device.

(b) Affected facilities must meet the fugitive emission limits and compliance requirements in Table 3 of this subpart within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under § 60.11. The requirements in Table 3 of this subpart apply for fugitive emissions from affected facilities without capture systems and for fugitive emissions escaping capture systems.

(c) [Reserved]

(d) Truck dumping of nonmetallic minerals into any screening operation, feed hopper, or crusher is exempt from the requirements of this section.

(e) If any transfer point on a conveyor belt or any other affected facility is enclosed in a building, then each enclosed affected facility must comply with the emission limits in paragraphs (a) and (b) of this section, or the building enclosing the affected facility or facilities must comply with the following emission limits:

(1) Fugitive emissions from the building openings (except for vents as defined in § 60.671) must not exceed 7 percent opacity; and

(2) Vents (as defined in § 60.671) in the building must meet the applicable stack emission limits and compliance requirements in Table 2 of this subpart.

(f) Any baghouse that controls emissions from only an individual, enclosed storage bin is exempt from the applicable stack PM concentration limit (and associated performance testing) in Table 2 of this subpart but must meet the applicable stack opacity limit and compliance requirements in Table 2 of this subpart. This exemption from the stack PM concentration limit does not apply for multiple storage bins with combined stack emissions.

§ 60.673 Reconstruction.

(a) The cost of replacement of ore-contact surfaces on processing equipment shall not be considered in calculating either the “fixed capital cost of the new components” or the “fixed capital cost that would be required to construct a comparable new facility” under § 60.15. Ore-contact surfaces are crushing surfaces; screen meshes, bars, and plates; conveyor belts; and elevator buckets.

(b) Under § 60.15, the “fixed capital cost of the new components” includes the fixed capital cost of all depreciable components (except components specified in paragraph (a) of this section) which are or will be replaced pursuant to all continuous programs of component replacement commenced within any 2-year period following August 31, 1983.

§ 60.674 Monitoring of operations.

(a) The owner or operator of any affected facility subject to the provisions of this subpart which uses a wet scrubber to control emissions shall install, calibrate, maintain and operate the following monitoring devices:

(1) A device for the continuous measurement of the pressure loss of the gas stream through the scrubber. The monitoring device must be certified by the manufacturer to be accurate within ±250 pascals ±1 inch water gauge pressure and must be calibrated on an annual basis in accordance with manufacturer's instructions.

(2) A device for the continuous measurement of the scrubbing liquid flow rate to the wet scrubber. The monitoring device must be certified by the manufacturer to be accurate within ±5 percent of design scrubbing liquid flow rate and must be calibrated on an annual basis in accordance with manufacturer's instructions.

(b) The owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses wet suppression to control emissions from the affected facility must perform monthly periodic inspections to check that water is flowing to discharge spray nozzles in the wet suppression system. The owner or operator must initiate corrective action within 24 hours and complete corrective action as expediently as practical if the owner or operator finds that water is not flowing properly during an inspection of the water spray nozzles. The owner or operator must record each inspection of the water spray nozzles, including the date of each inspection and any corrective actions taken, in the logbook required under § 60.676(b).

(1) If an affected facility relies on water carryover from upstream water sprays to control fugitive emissions, then that affected facility is exempt from the 5-year repeat testing requirement specified in Table 3 of this subpart provided that the affected facility meets the criteria in paragraphs (b)(1)(i) and (ii) of this section:

(i) The owner or operator of the affected facility conducts periodic inspections of the upstream water spray(s) that are responsible for controlling fugitive emissions from the affected facility. These inspections are conducted according to paragraph (b) of this section and § 60.676(b), and

(ii) The owner or operator of the affected facility designates which upstream water spray(s) will be periodically inspected at the time of the initial performance test required under § 60.11 of this part and § 60.675 of this subpart.

(2) If an affected facility that routinely uses wet suppression water sprays ceases operation of the water sprays or is using a control mechanism to reduce fugitive emissions other than water sprays during the monthly inspection (for example, water from recent rainfall), the logbook entry required under § 60.676(b) must specify the control mechanism being used instead of the water sprays.

(c) Except as specified in paragraph (d) or (e) of this section, the owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions must conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR part 60, Appendix A-7). The Method 22 (40 CFR part 60, Appendix A-7) test shall be conducted while the baghouse is operating. The test is successful if no visible emissions are observed. If any visible emissions are observed, the owner or operator of the affected facility must initiate corrective action within 24 hours to return the baghouse to normal operation. The owner or operator must record each Method 22 (40 CFR part 60, Appendix A-7) test, including the date and any corrective actions taken, in the logbook required under § 60.676(b). The owner or operator of the affected facility may establish a different baghouse-specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test according to § 60.675(b) simultaneously with a Method 22 (40 CFR part 60, Appendix A-7) to determine what constitutes normal visible emissions from that affected facility's baghouse when it is in compliance with the applicable PM concentration limit in Table 2 of this subpart. The revised visible emissions success level must be incorporated into the permit for the affected facility.

(d) As an alternative to the periodic Method 22 (40 CFR part 60, Appendix A-7) visible emissions inspections specified in paragraph (c) of this section, the owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions may use a bag leak detection system. The owner or operator must install, operate, and maintain the bag leak detection system according to paragraphs (d)(1) through (3) of this section.

(1) Each bag leak detection system must meet the specifications and requirements in paragraphs (d)(1)(i) through (viii) of this section.

(i) The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 1 milligram per dry standard cubic meter (0.00044 grains per actual cubic foot) or less.

(ii) The bag leak detection system sensor must provide output of relative PM loadings. The owner or operator shall continuously record the output from the bag leak detection system using electronic or other means (*e.g.* , using a strip chart recorder or a data logger).

(iii) The bag leak detection system must be equipped with an alarm system that will sound when the system detects an increase in relative particulate loading over the alarm set point established according to paragraph (d)(1)(iv) of this section, and the alarm must be located such that it can be heard by the appropriate plant personnel.

(iv) In the initial adjustment of the bag leak detection system, the owner or operator must establish, at a minimum, the baseline output by adjusting the sensitivity (range) and the averaging period of the device, the alarm set points, and the alarm delay time.

(v) Following initial adjustment, the owner or operator shall not adjust the averaging period, alarm set point, or alarm delay time without approval from the Administrator or delegated authority except as provided in paragraph (d)(1)(vi) of this section.

(vi) Once per quarter, the owner or operator may adjust the sensitivity of the bag leak detection system to account for seasonal effects, including temperature and humidity, according to the procedures identified in the site-specific monitoring plan required by paragraph (d)(2) of this section.

(vii) The owner or operator must install the bag leak detection sensor downstream of the fabric filter.

(viii) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

(2) The owner or operator of the affected facility must develop and submit to the Administrator or delegated authority for approval of a site-specific monitoring plan for each bag leak detection system. The owner or operator must operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times. Each monitoring plan must describe the items in paragraphs (d)(2)(i) through (vi) of this section.

(i) Installation of the bag leak detection system;

(ii) Initial and periodic adjustment of the bag leak detection system, including how the alarm set-point will be established;

(iii) Operation of the bag leak detection system, including quality assurance procedures;

(iv) How the bag leak detection system will be maintained, including a routine maintenance schedule and spare parts inventory list;

(v) How the bag leak detection system output will be recorded and stored; and

(vi) Corrective action procedures as specified in paragraph (d)(3) of this section. In approving the site-specific monitoring plan, the Administrator or delegated authority may allow owners and operators more than 3 hours to alleviate a specific condition that causes an alarm if the owner or operator identifies in the monitoring plan this specific condition as one that could lead to an alarm, adequately explains why it is not feasible to alleviate this condition within 3 hours of the time the alarm occurs, and demonstrates that the requested time will ensure alleviation of this condition as expeditiously as practicable.

(3) For each bag leak detection system, the owner or operator must initiate procedures to determine the cause of every alarm within 1 hour of the alarm. Except as provided in paragraph (d)(2)(vi) of this section, the owner or operator must alleviate the cause of the alarm within 3 hours of the alarm by taking whatever corrective action(s) are necessary. Corrective actions may include, but are not limited to the following:

(i) Inspecting the fabric filter for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in PM emissions;

(ii) Sealing off defective bags or filter media;

(iii) Replacing defective bags or filter media or otherwise repairing the control device;

(iv) Sealing off a defective fabric filter compartment;

(v) Cleaning the bag leak detection system probe or otherwise repairing the bag leak detection system; or

(vi) Shutting down the process producing the PM emissions.

(e) As an alternative to the periodic Method 22 (40 CFR part 60, Appendix A-7) visible emissions inspections specified in paragraph (c) of this section, the owner or operator of any affected facility that is subject to the requirements for processed stone handling operations in the Lime Manufacturing NESHAP (40 CFR part 63, subpart AAAAA) may follow the continuous compliance requirements in row 1 items (i) through (iii) of Table 6 to Subpart AAAAA of 40 CFR part 63.

§ 60.675 Test methods and procedures.

(a) In conducting the performance tests required in § 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendices A-1 through A-7 of this part or other methods and procedures as specified in this section, except as provided in § 60.8(b). Acceptable alternative methods and procedures are given in paragraph (e) of this section.

(b) The owner or operator shall determine compliance with the PM standards in § 60.672(a) as follows:

(1) Except as specified in paragraphs (e)(3) and (4) of this section, Method 5 of Appendix A-3 of this part or Method 17 of Appendix A-6 of this part shall be used to determine the particulate matter concentration. The sample volume shall be at least 1.70 dscm (60 dscf). For Method 5 (40 CFR part 60, Appendix A-3), if the gas stream being sampled is at ambient temperature, the sampling probe and filter may be operated without heaters. If the gas stream is above ambient temperature, the sampling probe and filter may be operated at a temperature high enough, but no higher than 121 °C (250 °F), to prevent water condensation on the filter.

(2) Method 9 of Appendix A-4 of this part and the procedures in § 60.11 shall be used to determine opacity.

(c)(1) In determining compliance with the particulate matter standards in § 60.672(b) or § 60.672(e)(1), the owner or operator shall use Method 9 of Appendix A-4 of this part and the procedures in § 60.11, with the following additions:

(i) The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).

(ii) The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (*e.g.,* road dust). The required observer position relative to the sun (Method 9 of Appendix A-4 of this part, Section 2.1) must be followed.

(iii) For affected facilities using wet dust suppression for particulate matter control, a visible mist is sometimes generated by the spray. The water mist must not be confused with particulate matter emissions and is not to be considered a visible emission. When a water mist of this nature is present, the observation of emissions is to be made at a point in the plume where the mist is no longer visible.

(2)(i) In determining compliance with the opacity of stack emissions from any baghouse that controls emissions only from an individual enclosed storage bin under § 60.672(f) of this subpart, using Method 9 (40 CFR part 60, Appendix A-4), the duration of the Method 9 (40 CFR part 60, Appendix A-4) observations shall be 1 hour (ten 6-minute averages).

(ii) The duration of the Method 9 (40 CFR part 60, Appendix A-4) observations may be reduced to the duration the affected facility operates (but not less than 30 minutes) for baghouses that control storage bins or enclosed truck or railcar loading stations that operate for less than 1 hour at a time.

(3) When determining compliance with the fugitive emissions standard for any affected facility described under § 60.672(b) or § 60.672(e)(1) of this subpart, the duration of the Method 9 (40 CFR part 60, Appendix A-4) observations must be 30 minutes (five 6-minute averages). Compliance with the applicable fugitive emission limits in Table 3 of this subpart must be based on the average of the five 6-minute averages.

(d) To demonstrate compliance with the fugitive emission limits for buildings specified in § 60.672(e)(1), the owner or operator must complete the testing specified in paragraph (d)(1) and (2) of this section. Performance tests must be conducted while all affected facilities inside the building are operating.

(1) If the building encloses any affected facility that commences construction, modification, or reconstruction on or after April 22, 2008, the owner or operator of the affected facility must conduct an initial Method 9 (40 CFR part 60, Appendix A-4) performance test according to this section and § 60.11.

(2) If the building encloses only affected facilities that commenced construction, modification, or reconstruction before April 22, 2008, and the owner or operator has previously conducted an initial Method 22 (40 CFR part 60, Appendix A-7) performance test showing zero visible emissions, then the owner or operator has demonstrated compliance with

the opacity limit in § 60.672(e)(1). If the owner or operator has not conducted an initial performance test for the building before April 22, 2008, then the owner or operator must conduct an initial Method 9 (40 CFR part 60, Appendix A-4) performance test according to this section and § 60.11 to show compliance with the opacity limit in § 60.672(e)(1).

(e) The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:

(1) For the method and procedure of paragraph (c) of this section, if emissions from two or more facilities continuously interfere so that the opacity of fugitive emissions from an individual affected facility cannot be read, either of the following procedures may be used:

(i) Use for the combined emission stream the highest fugitive opacity standard applicable to any of the individual affected facilities contributing to the emissions stream.

(ii) Separate the emissions so that the opacity of emissions from each affected facility can be read.

(2) A single visible emission observer may conduct visible emission observations for up to three fugitive, stack, or vent emission points within a 15-second interval if the following conditions are met:

(i) No more than three emission points may be read concurrently.

(ii) All three emission points must be within a 70 degree viewing sector or angle in front of the observer such that the proper sun position can be maintained for all three points.

(iii) If an opacity reading for any one of the three emission points equals or exceeds the applicable standard, then the observer must stop taking readings for the other two points and continue reading just that single point.

(3) Method 5I of Appendix A-3 of this part may be used to determine the PM concentration as an alternative to the methods specified in paragraph (b)(1) of this section. Method 5I (40 CFR part 60, Appendix A-3) may be useful for affected facilities that operate for less than 1 hour at a time such as (but not limited to) storage bins or enclosed truck or railcar loading stations.

(4) In some cases, velocities of exhaust gases from building vents may be too low to measure accurately with the type S pitot tube specified in EPA Method 2 of Appendix A-1 of this part [*i.e.,* velocity head <1.3 mm H_2O (0.05 in. H_2O)] and referred to in EPA Method 5 of Appendix A-3 of this part. For these conditions, the owner or operator may determine the average gas flow rate produced by the power fans (*e.g.,* from vendor-supplied fan curves) to the building vent. The owner or operator may calculate the average gas velocity at the building vent measurement site using Equation 1 of this section and use this average velocity in determining and maintaining isokinetic sampling rates.

$$v_e = \frac{Q_f}{A_e} \qquad (Eq. 1)$$

Where:

V_e = average building vent velocity (feet per minute);

Q_f = average fan flow rate (cubic feet per minute); and

A_e = area of building vent and measurement location (square feet).

(f) To comply with § 60.676(d), the owner or operator shall record the measurements as required in § 60.676(c) using the monitoring devices in § 60.674 (a)(1) and (2) during each particulate matter run and shall determine the averages.

(g) For performance tests involving only Method 9 (40 CFR part 60 Appendix A-4) testing, the owner or operator may reduce the 30-day advance notification of performance test in § 60.7(a)(6) and 60.8(d) to a 7-day advance notification.

(h) [Reserved]

(i) If the initial performance test date for an affected facility falls during a seasonal shut down (as defined in § 60.671 of this subpart) of the affected facility, then with approval from the permitting authority, the owner or operator may postpone the initial performance test until no later than 60 calendar days after resuming operation of the affected facility.

§ 60.676 Reporting and recordkeeping.

(a) Each owner or operator seeking to comply with § 60.670(d) shall submit to the Administrator the following information about the existing facility being replaced and the replacement piece of equipment.

(1) For a crusher, grinding mill, bucket elevator, bagging operation, or enclosed truck or railcar loading station:

(i) The rated capacity in megagrams or tons per hour of the existing facility being replaced and

(ii) The rated capacity in tons per hour of the replacement equipment.

(2) For a screening operation:

(i) The total surface area of the top screen of the existing screening operation being replaced and

(ii) The total surface area of the top screen of the replacement screening operation.

(3) For a conveyor belt:

(i) The width of the existing belt being replaced and

(ii) The width of the replacement conveyor belt.

(4) For a storage bin:

(i) The rated capacity in megagrams or tons of the existing storage bin being replaced and

(ii) The rated capacity in megagrams or tons of replacement storage bins.

(b)(1) Owners or operators of affected facilities (as defined in §§ 60.670 and 60.671) for which construction, modification, or reconstruction commenced on or after April 22, 2008, must record each periodic inspection required under § 60.674(b) or (c), including dates and any corrective actions taken, in a logbook (in written or electronic format). The owner or operator must keep the logbook onsite and make hard or electronic copies (whichever is requested) of the logbook available to the Administrator upon request.

(2) For each bag leak detection system installed and operated according to § 60.674(d), the owner or operator must keep the records specified in paragraphs (b)(2)(i) through (iii) of this section.

(i) Records of the bag leak detection system output;

(ii) Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings; and

(iii) The date and time of all bag leak detection system alarms, the time that procedures to determine the cause of the alarm were initiated, the cause of the alarm, an explanation of the actions taken, the date and time the cause of the alarm was alleviated, and whether the cause of the alarm was alleviated within 3 hours of the alarm.

(3) The owner or operator of each affected facility demonstrating compliance according to § 60.674(e) by following the requirements for processed stone handling operations in the Lime Manufacturing NESHAP (40 CFR part 63, subpart AAAAA) must maintain records of visible emissions observations required by § 63.7132(a)(3) and (b) of 40 CFR part 63, subpart AAAAA.

(c) During the initial performance test of a wet scrubber, and daily thereafter, the owner or operator shall record the measurements of both the change in pressure of the gas stream across the scrubber and the scrubbing liquid flow rate.

(d) After the initial performance test of a wet scrubber, the owner or operator shall submit semiannual reports to the Administrator of occurrences when the measurements of the scrubber pressure loss and liquid flow rate decrease by more than 30 percent from the average determined during the most recent performance test.

(e) The reports required under paragraph (d) of this section shall be postmarked within 30 days following end of the second and fourth calendar quarters.

(f) The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in § 60.672 of this subpart, including reports of opacity observations made using Method 9 (40 CFR part 60, Appendix A-4) to demonstrate compliance with § 60.672(b), (e) and (f).

(g) The owner or operator of any wet material processing operation that processes saturated and subsequently processes unsaturated materials, shall submit a report of this change within 30 days following such change. At the time of such change, this screening operation, bucket elevator, or belt conveyor becomes subject to the applicable opacity limit in § 60.672(b) and the emission test requirements of § 60.11.

(h) The subpart A requirement under § 60.7(a)(1) for notification of the date construction or reconstruction commenced is waived for affected facilities under this subpart.

(i) A notification of the actual date of initial startup of each affected facility shall be submitted to the Administrator.

(1) For a combination of affected facilities in a production line that begin actual initial startup on the same day, a single notification of startup may be submitted by the owner or operator to the Administrator. The notification shall be postmarked within 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available.

(2) For portable aggregate processing plants, the notification of the actual date of initial startup shall include both the home office and the current address or location of the portable plant.

(j) The requirements of this section remain in force until and unless the Agency, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected facilities within the State will be relieved of the obligation to comply with the reporting requirements of this section, provided that they comply with requirements established by the State.

(k) Notifications and reports required under this subpart and under subpart A of this part to demonstrate compliance with this subpart need only to be sent to the EPA Region or the State which has been delegated authority according to § 60.4(b).

Table 1 to Subpart OOO of Part 60—Exceptions to Applicability of Subpart A to Subpart OOO

Subpart A reference	Applies to subpart OOO	Explanation
60.4, Address	Yes	Except in § 60.4(a) and (b) submittals need not be submitted to both the EPA Region and delegated State authority (§ 60.676(k)).
60.7, Notification and recordkeeping	Yes	Except in (a)(1) notification of the date construction or reconstruction commenced (§ 60.676(h)).
		Also, except in (a)(6) performance tests involving only Method 9 (40 CFR part 60, Appendix A-4) require a 7-day advance notification instead of 30 days (§ 60.675(g)).
60.8, Performance tests	Yes	Except in (d) performance tests involving only Method 9 (40 CFR part 60, Appendix A-4) require a 7-day advance notification instead of 30 days (§ 60.675(g)).
60.11, Compliance with standards and maintenance requirements	Yes	Except in (b) under certain conditions (§§ 60.675(c)), Method 9 (40 CFR part 60, Appendix A-4) observation is reduced from 3 hours to 30 minutes for fugitive emissions.
60.18, General control device	No	Flares will not be used to comply with the emission limits.

Table 2 to Subpart OOO of Part 60—Stack Emission Limits for Affected Facilities With Capture Systems

For * * *	The owner or operator must meet a PM limit of * * *	And the owner or operator must meet an opacity limit of * * *	The owner or operator must demonstrate compliance with these limits by conducting * * *
Affected facilities (as defined in §§ 60.670 and 60.671) that commenced construction, modification, or reconstruction after August 31, 1983 but before April 22, 2008	0.05 g/dscm (0.022 gr/dscf) [a]	7 percent for dry control devices [b]	An initial performance test according to § 60.8 of this part and § 60.675 of this subpart; and Monitoring of wet scrubber parameters according to § 60.674(a) and § 60.676(c), (d), and (e).
Affected facilities (as defined in §§ 60.670 and 60.671) that commence construction, modification, or reconstruction on or after April 22, 2008	0.032 g/dscm (0.014 gr/dscf) [a]	Not applicable (except for individual enclosed storage bins) 7 percent for dry control devices on individual enclosed storage bins	An initial performance test according to § 60.8 of this part and § 60.675 of this subpart; and Monitoring of wet scrubber parameters according to § 60.674(a) and § 60.676(c), (d), and (e); and
			Monitoring of baghouses according to § 60.674(c), (d), or (e) and § 60.676(b).

[a] Exceptions to the PM limit apply for individual enclosed storage bins and other equipment. See § 60.672(d) through (f).

[b] The stack opacity limit and associated opacity testing requirements do not apply for affected facilities using wet scrubbers.

Table 3 to Subpart OOO of Part 60—Fugitive Emission Limits

For * * *	The owner or operator must meet the following fugitive emissions limit for grinding mills, screening operations, bucket elevators, transfer points on belt conveyors, bagging operations, storage bins, enclosed truck or railcar loading stations or from any other affected facility (as defined in §§ 60.670 and 60.671) * * *	The owner or operator must meet the following fugitive emissions limit for crushers at which a capture system is not used * * *	The owner or operator must demonstrate compliance with these limits by conducting * * *
Affected facilities (as defined in §§ 60.670 and 60.671) that commenced construction, modification, or reconstruction after August 31, 1983 but before April 22, 2008	10 percent opacity	15 percent opacity	An initial performance test according to § 60.11 of this part and § 60.675 of this subpart.
Affected facilities (as defined in §§ 60.670 and 60.671) that commence construction, modification, or reconstruction on or after April 22, 2008	7 percent opacity	12 percent opacity	An initial performance test according to § 60.11 of this part and § 60.675 of this subpart; and Periodic inspections of water sprays according to § 60.674(b) and § 60.676(b); and
			A repeat performance test according to § 60.11 of this part and § 60.675 of this subpart within 5 years from the previous performance test for fugitive emissions from affected facilities without water sprays. Affected facilities controlled by water carryover from upstream water sprays that are inspected according to the requirements in § 60.674(b) and § 60.676(b) are exempt from this 5-year repeat testing requirement.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Description and Location

Source Name:	**BrickCraft, Inc.**
Source Location:	**200 North SR 59, Center Point, Indiana 47840**
County:	**Clay**
SIC Code:	**3251 (Brick and Structural Clay Tile)**
Permit Renewal No.:	**T 021-42808-00054**
Permit Reviewer:	**Andrea C. Smith**

On April 27, 2020, BrickCraft, Inc. submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from BrickCraft, Inc. relating to the operation of a brick manufacturing plant. BrickCraft, Inc. was issued its second Part 70 Operating Permit Renewal (T 021-42808-00054) on January 27, 2016.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T 021-36312-00054 on January 27, 2016. The source has since received the following approval:

Administrative Amendment No. 021-42222-00054 on December 17, 2019.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) quarry, constructed in 2004, with a capacity of 125 tons of shale per hour;

(b) Three (3) outdoor aggregate storage piles, with a combined capacity of 125 tons of shale per hour.

(c) One (1) pre-kiln clay/shale/fireclay/sand processing operation, identified as EU-02, constructed in 2004, with a maximum capacity of 125 tons of raw material (including clay, fireclay, shale, and sand) per hour, consisting of the following equipment:

(1) One (1) primary crusher, with a maximum capacity of 125 tons of raw material per hour, exhausting internally.

Under NSPS Subpart OOO, this is an affected facility enclosed in a building

(2) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally.

Under NSPS Subpart OOO, this is an affected facility enclosed in a building

(3) One (1) grinding and scalping screen operation, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally.

Under NSPS Subpart OOO, this is an affected facility enclosed in a building

(4) One (1) coarse material return conveyor with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally.

Under NSPS Subpart OOO, this is an affected facility enclosed in a building

(5) One (1) transfer conveyor with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally.

Under NSPS Subpart OOO, this is an affected facility enclosed in a building

(6) One (1) secondary crusher with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally.

Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(7) One (1) transfer conveyor with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally.

Under NSPS Subpart OOO, this is an affected facility enclosed in a building

(8) One (1) finishing screen operation with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally.

Under NSPS Subpart OOO, this is an affected facility enclosed in a building

(9) One (1) coarse material return conveyor with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally.

Under NSPS Subpart OOO, this is an affected facility enclosed in a building

(10) Two (2) transfer conveyors with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally.

Under NSPS Subpart OOO, these are affected facilities enclosed in a building

(11) Six (6) crushed material storage bins with a maximum capacity of 100 tons, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally.

Under NSPS Subpart OOO, these are affected facilities enclosed in a building

(12) Two (2) transfer conveyors with a maximum capacity of 60 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally.

(13) One (1) enclosed mixing pugmill with a maximum capacity of 60 tons per hour, using baghouse BH-2 as particulate control, exhausting internally.

(14) One (1) transfer conveyor with a maximum capacity of 60 tons of milled material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally.

(15) One (1) extrusion operation with a maximum capacity of 60 tons of milled material per hour, with emissions uncontrolled.

(d) One (1) brick manufacturing line, identified as EU-01, with a maximum capacity of 10 tons of bricks per hour, consisting of:

(1) One (1) brick dryer, constructed in 2004, with a maximum capacity of 10 tons of bricks per hour, using recycled hot air from the gas-fired kiln, exhausting through stacks D-1 and CZ-1

(2) One (1) natural gas-fired tunnel kiln, constructed in 2004, rated at 56 million British thermal units per hour, with a maximum capacity of 10 tons of bricks per hour, using a dry injection fabric filter (DIFF) as control, and exhausting through stacks POC-1 and UCC-1

(3) One (1) lime storage silo, identified as Lime Silo, constructed in 2009, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF).

(4) One (1) sodium bicarbonate storage silo, identified as Bicarb Silo, constructed in 2004, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF).

(e) One (1) outdoor spent injection material storage pile, with a capacity of 185 pounds of lime/sodium bicarbonate mixture per hour.

Insignificant Activities

The source also consists of the following insignificant activities:

(a) Combustion source flame safety purging on start-up.

(b) Petroleum fuel (other than gasoline) dispensing facilities, having storage capacity of less than or equal to 10,500 gallons and dispensing less than or equal to 230,000 gallons per month:

(1) One (1) storage tank, constructed in 2004, identified as Main, for storage of diesel fuel, with a maximum volume of 1,000 gallons; and

(2) One (1) storage tank, constructed in 2004, identified as Quarry, for storage of diesel fuel, with a maximum volume of 2,000 gallons.

(c) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(d) Refractory storage not requiring air pollution control equipment.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(f) A laboratory as defined in 326 IAC 2-7-1(20)(C).

(g) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day PM_{10}, SO_2, or NO_x; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):

(1) One (1) additive feeder, with a maximum capacity of six (6) tons per hour, using baghouse BH-1 as particulate control, exhausting internally;

(2) One (1) enclosed surge bin, with a maximum capacity of 20 tons, using baghouse BH-1 as particulate control, exhausting internally;

(3) One (1) texture feeder, with a maximum capacity of 0.25 tons per hour, using baghouse BH-2 as particulate control, exhausting internally; and

(4) One (1) packaging area, with a maximum capacity of 38 tons per hour, using baghouse BH-2 as particulate control, exhausting internally.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

County Attainment Status

The source is located in Clay County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
$PM_{2.5}$	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO_2 standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Clay County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Clay County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(e) Other Criteria Pollutants
Clay County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

	Unrestricted Potential Emissions (ton/year)									
	PM[1]	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Flourides**	**Single HAP[3]**	**Total HAPs**
Total PTE of Entire Source Excluding Fugitive Emissions*	**928.58**	**362.82**	**362.82**	**1095.01**	**17.52**	**2.49**	**54.40**	**25.84**	**16.21**	**24.70**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	--	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	25	--	--

[1]Under the Part 70 Permit program (40 CFR 70), PM_{10} and $PM_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."

[2]$PM_{2.5}$ listed is direct $PM_{2.5}$.

[3]Single highest source-wide HAP

*Fugitive HAP emissions are always included in the source-wide emissions.

This table reflects the unrestricted potential emissions of the source.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM10, PM2.5, and SO2 is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. The source will be issued a Part 70 Operating Permit Renewal.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM[1]	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Total Fluorides**	**Single HAP[3]**	**Total HAPs**
Total PTE of Entire Source Including Fugitive Emissions*	**246.60**	**237.11**	**237.11**	**249.01**	**17.52**	**2.49**	**54.40**	**23.25**	**9.99**	**18.48**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	-	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	25	NA	NA

[1]Under the Part 70 Permit program (40 CFR 70), PM_{10} and $PM_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."

[2]$PM_{2.5}$ listed is direct $PM_{2.5}$.

[3]Single highest source-wide HAP

*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source and to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD), and 326 IAC 20 (Hazardous Air Pollutants) for more information regarding the limit(s).

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per

year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for this source , because each of the storage tanks has an individual volume less than 75 cubic meters (19,800 gallons).

(b) The requirements of the New Source Performance Standard for Metallic Mineral Processing Plants 40 CFR 60, Subpart LL and 326 IAC 12, are not included in the permit for this source, because the source does not produce metallic mineral concentrates from ore.

(c) The requirements of the New Source Performance Standard for Calciners and Dryers in Mineral Industries 40 CFR 60, Subpart UUU and 326 IAC 12, are not included in the permit for this source, because only the calcining and drying of raw materials prior to firing of the brick are covered under this subpart. The brick dryer and kiln operations are for drying bricks and not drying raw materials.

(d) This source is subject to the New Source Performance Standards for Nonmetallic Mineral Processing Plants 40 CFR 60, Subpart OOO and 326 IAC 12, because pursuant to 40 CFR 60.672, "no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility and stack emissions." The unit subject to this rule includes the following:

(a) Truck dumping (with the use of front end loaders) into the primary crusher is not subject to the requirements of the Standards of Performance for Nonmetallic Mineral Processing Plants, 40 CFR 60.670, Subpart OOO, because, pursuant to 40 CFR 60.672(d), the process is exempt from the requirements of this section.

(b) The following facilities are not subject to the requirements of the Standards of Performance for Nonmetallic Mineral Processing Plants, 40 CFR 60.670, Subpart OOO:

(1) One (1) pre-kiln clay/shale/fireclay/sand processing operation, identified as EU-02, installed in 2004, with a maximum capacity of 125 tons of raw material (including clay, fireclay, shale, and sand) per hour, consisting of the following equipment:

(A) Two (2) transfer conveyors, each with a maximum capacity of 60 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally;

(B) One (1) enclosed mixing pugmill, with a maximum capacity of 60 tons per hour, using baghouse BH-2 as particulate control, exhausting internally;

(C) One (1) transfer conveyor, with a maximum capacity of 60 tons of milled material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally; and

(D) One (1) extrusion operation, with a maximum capacity of 60 tons of milled material per hour, with emissions uncontrolled.

(2) One (1) brick manufacturing line, identified as EU-01, installed in 2004, with a maximum capacity of 10 tons of bricks per hour, consisting of:

(A) One (1) brick dryer, with a maximum capacity of 10 tons of bricks per hour, using recycled hot air from the gas-fired kiln, exhausting through stacks D-1 and CZ-1;

(B) One (1) natural gas-fired tunnel kiln, rated at 56 million British thermal units per hour, with a maximum capacity of 10 tons of bricks per hour, using a dry injection fabric filter (DIFF) as a control device for both hydrogen fluoride and sulfur dioxide, exhausting through stacks POC-1 and UCC-1;

(C) One (1) lime storage silo, identified as Lime Silo, constructed in 2009, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry injection fabric filter (DIFF); and

(D) One (1) sodium bicarbonate storage silo, identified as Bicarb Silo, constructed in 2004, permitted in 2011, with a maximum capacity of 50 tons and a maximum throughput of 25 tons per hour, exhausting to the dry lime injection fabric filter (DIFF).

Insignificant Activities

(3) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day PM_{10}, SO_2, or NO_x; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):

(A) One (1) additive feeder, with a maximum capacity of six (6) tons per hour, using baghouse BH-1 as particulate control, exhausting internally;

(B) One (1) enclosed surge bin, with a maximum capacity of 20 tons, using baghouse BH-1 as particulate control, exhausting internally;

(C) One (1) texture feeder, with a maximum capacity of 0.25 tons per hour, using baghouse BH-2 as particulate control, exhausting internally; and

(D) One (1) packaging area, with a maximum capacity of 38 tons per hour, using baghouse BH-2 as particulate control, exhausting internally.

According to EPA's Applicability Determination Index (ADI) database (http://www.epa.gov/compliance/monitoring/programs/caa/adi.html) posting dated August 15, 2002 (Control Number: 0200088), since the aggregate coming from the crushed material storage bins is used in the manufacture of brick rather than being crushed or ground, all emission units following the storage bins are not affected facilities in a production line at a nonmetallic mineral processing plant. Therefore, the facilities listed above are not subject to the requirements of the Standards of Performance for Nonmetallic Mineral Processing Plants, 40 CFR 60.670, Subpart OOO.

(e) This source is subject to the New Source Performance Standards for Nonmetallic Mineral Processing Plants 40 CFR 60, Subpart OOO and 326 IAC 12, because this source has affected facilities in fixed or portable nonmetallic mineral processing plants: each crusher, grinding mill,

screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck, or railcar loading station. The specific facilities include the following:

(1) One (1) pre-kiln clay/shale/fireclay/sand processing operation, identified as EU-02, installed in 2004, with a maximum capacity of 125 tons of raw material (including clay, fireclay, shale, and sand) per hour, consisting of the following equipment:

(A) One (1) primary crusher, with a maximum capacity of 125 tons of raw material per hour, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(B) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(C) One (1) grinding and scalping screen operation, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(D) One (1) coarse material return conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(E) One (1) transfer conveyor, with a maximum capacity of 125 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(F) One (1) secondary crusher, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(G) One (1) transfer conveyor, with a maximum capacity of 110 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(H) One (1) finishing screen operation, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(I) One (1) coarse material return conveyor, with a maximum capacity of 70 tons of raw material per hour, using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, this is an affected facility enclosed in a building;

(J) Two (2) transfer conveyors, each with a maximum capacity of 70 tons of raw material per hour, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

(K) Six (6) crushed material storage bins, each having a capacity of 100 tons, each using a hood venting to baghouse BH-1 as particulate control, exhausting internally. Under NSPS Subpart OOO, these are affected facilities enclosed in a building;

Pursuant to 40 CFR 60.670(e), the Permittee shall comply with the requirements of 40 CFR 60, Subpart OOO upon the issuance of this permit.

This source is subject to the following portions of Subpart OOO.

(1) 40 CFR 60.670 (a)(1), (d), (e), (f)
(2) 40 CFR 60.671
(3) 40 CFR 60.672 (b), (d), (e)(1), (f)
(4) 40 CFR 60.673r
(5) 40 CFR 60.675 (a), (c)(1)(i), (c)(1)(ii), (c)(2), (c)(3), (d)(2), (e), (g), (i)
(6) 40 CFR 60.676 (a), (f), (h), (i)(1), (j), (k)
(7) Table 1 to 40 CFR 63, Subpart OOO
(8) Table 3 to 40 CFR 63, Subpart OOO

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to these sources except as otherwise specified in 40 CFR 60, Subpart OOO.

(f) The requirements of the New Source Performance Standard for Calciners and Dryers in Mineral Industries, 40 CFR 60, Subpart UUU and 326 IAC 12, are not included in the permit for this source, because only the calcining and drying of raw materials prior to firing of the brick are covered under this subpart. The brick dryer and kiln operations are for drying bricks and not drying raw materials.

(g) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning 40 CFR 63, Subpart T and 326 IAC 20-6 are not included in the permit for this source, since the source does not utilize degreasing operations.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for From the Portland Cement Manufacturing Industry 40 CFR 63, Subpart LLL and 326 IAC 20-27 are not included in the permit for this source, since this source does not manufacture Portland cement.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Stationary Reciprocating Internal Combustion Engines 40 CFR 63, Subpart ZZZZ and 326 IAC 20-82 are not included in the permit for this source, since the source does not utilize emergency generators or stationary fire pumps.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Lime Manufacturing Plants 40 CFR 63, Subpart AAAAA and 326 IAC 20-91 are not included in the permit for this source, since this source does not manufacture lime.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Category: Gasoline Dispensing Facilities 40 CFR 63, Subpart CCCCCC is not included in the permit for this source, since the source dispenses diesel fuel, not gasoline.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Industrial, Commercial, and Institutional Boilers, 40 CFR 63, Subpart JJJJJJ is not included in the permit for this source, since the source does not utilize boilers.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Clay Ceramics Manufacturing Area Sources 40 CFR 63, Subpart RRRRRR is not included in the permit for this source, since the source does not meet the definition of a clay ceramics manufacturing facility, as defined in 40 CFR 63.11444.

This Source has taken the following limits to be an area source under 40 CFR 63:

(1) The HF emissions from the dry injection fabric filter (DIFF) controlling the tunnel kiln shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) The dry injection fabric filter (DIFF) for HF control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

Compliance with the above limits, combined with the potential to emit HF from all other emission units at the source, shall limit the source-wide total potential to emit of HF to less than 10 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and this source is an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

Therefore, the requirements of the following NESHAPs under 40 CFR Part 63 are not included in the permit:

- NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63.7480, Subpart DDDDD);
- NESHAP for Brick and Structural Clay Products Manufacturing (40 CFR 63.8380, Subpart JJJJJ);
- NESHAP for Clay Ceramics Manufacturing (40 CFR 63.8530, Subpart KKKKK); and
- NESHAP for Refractory Products Manufacturing (40 CFR 63.9780, Subpart SSSSS).

(h) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

The following table is used to identify the applicability of CAM to each emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

Emission Unit / Pollutant	Control Device Used	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Each Conveyor EU-02/PM*	BH-1	326 IAC 6-3-2	<100	<100	N	N
Each Conveyor EU-02/ PM	BH-1	326 IAC 2-2	--	--	N[1]	--
Each Conveyor EU-02/ PM10	BH-1	326 IAC 2-2	<100	--	N	N
Each Conveyor EU-02/PM2.5	BH-1	326 IAC 2-2	<100	--	N	N
Grinding & Scalping Screen Operation EU-02/PM*	BH-1	326 IAC 6-3-2	<100	<100	N	N
Grinding & Scalping Screen Operation EU-02/PM	BH-1	326 IAC 2-2	--	--	N[1]	--
Grinding & Scalping Screen Operation EU-02/PM10	BH-1	326 IAC 2-2	<100	--	N	N
Grinding & Scalping Screen Operation EU-02/PM2.5	BH-1	326 IAC 2-2	<100	--	N	N
Secondary Crusher EU-02/ PM*	BH-1	326 IAC 2-2	--	--	N[1]	--
Secondary Crusher EU-02/ PM	BH-1	326 IAC 2-2	--	--	N[1]	--
Secondary Crusher EU-02/ PM10	BH-1	326 IAC 2-2	<100	--	N	N
Secondary Crusher EU-02/ PM2.5	BH-1	326 IAC 2-2	<100	--	N	N
Finishing Screen Operation EU-02/ PM*	BH-1	326 IAC 2-2	--	--	N[1]	--
Finishing Screen Operation EU-02/ PM	BH-1	326 IAC 2-2	--	--	N[1]	--
Finishing Screen Operation EU-02/ PM10	BH-1	326 IAC 2-2	<100	--	N	N
Finishing Screen Operation EU-02/PM2.5	BH-1	326 IAC 2-2	<100	--	N	N
Each Crushed Material Storage Bin EU-02/PM*	BH-1	326 IAC 2-2	--	--	N[1]	--
Each Crushed Material Storage Bin EU-02/PM	BH-1	326 IAC 2-2	--	--	N[1]	--
Each Crushed Material Storage Bin EU-02/ PM10	BH-1	326 IAC 2-2	<100	--	N	N

Emission Unit / Pollutant	Control Device Used	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Each Crushed Material Storage Bin EU-02/ PM2.5	BH-1	326 IAC 2-2	<100	--	N	N
Pugmill EU-02/PM*	BH-1	326 IAC 2-2	--	--	N[2]	--
Pugmill EU-02/PM	BH-1	326 IAC 2-2	--	--	N[2]	--
Pugmill EU-02/ PM10	BH-1	326 IAC 2-2	<100	--	N[2]	N
Pugmill EU-02/ PM2.5	BH-1	326 IAC 2-2	<100	--	N[2]	N
Additive Feeder EU-02/ PM*	BH-1	326 IAC 2-2	--	--	N[1]	--
Additive Feeder EU-02/ PM	BH-1	326 IAC 2-2	--	--	N[1]	--
Additive Feeder EU-02/ PM10	BH-1	326 IAC 2-2	<100	--	N	N
Additive Feeder EU-02/ PM2.5	BH-1	326 IAC 2-2	<100	--	N	N
Surge Bin EU-02/PM*	BH-1	326 IAC 2-2	--	--	N[1]	--
Surge Bin EU-02/PM	BH-1	326 IAC 2-2	--	--	N[1]	--
Surge Bin EU-02/ PM10	BH-1	326 IAC 2-2	<100	--	N	N
Surge Bin EU-02/ PM2.5	BH-1	326 IAC 2-2	<100	--	N	N
Texture Feeder EU-02/ PM*	BH-1	326 IAC 2-2	--	--	N[1]	--
Texture Feeder EU-02/ PM	BH-1	326 IAC 2-2	--	--	N[1]	--
Texture Feeder EU-02/ PM10	BH-1	326 IAC 2-2	<100	--	N	N
Texture Feeder EU-02/ PM2.5	BH-1	326 IAC 2-2	<100	--	N	N
Packaging Area EU-02/ PM*	BH-1	326 IAC 2-2	--	--	N[1]	--
Packaging Area EU-02/ PM	BH-1	326 IAC 2-2	--	--	N[1]	--
Packaging Area EU-02/ PM10	BH-1	326 IAC 2-2	<100	--	N	N
Packaging Area EU-02/ PM2.5	BH-1	326 IAC 2-2	<100	--	N	N
Natural gas fired kiln – PM*	DIFF	326 IAC 2-2	>100	<100	Y	N
Natural gas fired kiln – PM10	DIFF	326 IAC 2-2	>100	<100	Y	N
Natural gas fired kiln – PM2.5	DIFF	326 IAC 2-2	>100	<100	Y	N
Natural gas fired kiln – SO2	DIFF	326 IAC 2-2	>100	<100	Y	N
Natural gas fired kiln – Total Fluorides	DIFF	326 IAC 2-2	>25	<25	Y	N
Natural gas fired kiln – HF	DIFF	326 IAC 2-2	>10	<10	Y	N
Natural gas fired kiln – HCL	DIFF	N	<10	<10	N	N
Natural gas fired kiln – Total HAPs	DIFF	N	<25	<25	N	N

Emission Unit / Pollutant	Control Device Used	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Under the Part 70 Permit program (40 CFR 70), PM is not a regulated air pollutant. Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for regulated air pollutants (PM10, PM2.5, SO2, Nox, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.						
PM* For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.						
N [1] Under 326 IAC 2-2, PM is not a surrogate for a regulated air pollutant. Therefore, CAM does not apply to these emission units for the 326 IAC 2-2 PM limitation.						
N[2] While the pugmill does have a baghouse for PM control, it does not have to run it to be in compliance with any applicable rule or limitation. Therefore, CAM does not apply.						
Controls: BH = Baghouse, C = Cyclone, DC = Dust Collection System, RTO = Regenerative or Recuperative Thermal Oxidizer, WS = Wet Scrubber, ESP = Electrostatic Preciptator						
Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed in this table.						
* While PM is not a regulated pollutant, PM is regulated as a surrogate for PM10 .						

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to the natural gas fired kiln for PM, PM10, PM2.5, SO2, Total Flourides, and HF. A CAM plan was submitted as part of a previous permit application and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD and Emission Offset applicability is discussed under the Potential to Emit After Issuance section of this document.

PSD Minor Source Limits

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The total PM emissions from the tunnel kiln, lime silo, and sodium bicarbonate silo shall not exceed 5.0 pounds per hour.

(b) The total PM_{10} emissions from the tunnel kiln, lime silo, and sodium bicarbonate silo shall not exceed 35.0 pounds per hour.

(c) The total $PM_{2.5}$ emissions from the tunnel kiln, lime silo, and sodium bicarbonate silo shall not exceed 35.0 pounds per hour.

(d) The SO_2 emissions from the dry injection fabric filter (DIFF) controlling the tunnel kiln, lime silo, and sodium bicarbonate silo shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(e) The total Fluoride emissions from the tunnel kiln, lime silo, and sodium bicarbonate silo shall not exceed 5.30 pounds per hour when the DIFF is in operation.

(f) The dry injection fabric filter (DIFF) for PM, PM_{10}, and $PM_{2.5}$ control shall be in operation and control emissions from the lime silo and sodium bicarbonate silo at all times that either of the silos are being loaded.

(g) The dry injection fabric filter (DIFF) for SO_2 and total Fluoride control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

Compliance with these limits, combined with the potential to emit PM, PM10, PM2.5, SO2, NOx, VOC, CO, total Fluorides from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, total Fluoride, and SO2 to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of one (1) brick dryer and three (3) torpedo heaters will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

The operation of the tunnel kiln has the potential to emit greater than 10 tons per year of HF. Therefore, 326 IAC 2-4.1 would have applied to this facility. The source has decided to limit its HF emissions below the major source threshold as follows:

(a) The HF emissions from the dry injection fabric filter (DIFF) controlling the tunnel kiln, lime silo, and sodium bicarbonate silo shall be less than10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The dry injection fabric filter (DIFF) for HF control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

Compliance with the above limits, combined with the potential to emit HF from all other emission units at the source, shall limit the source-wide total potential to emit of HF to less than 10 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and this source is an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

326 IAC 2-6 (Emission Reporting)
This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting), since it is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to 326 IAC 2-6-3(a)(2), the Permittee shall submit triennially, by July 1, an emission statement covering the previous calendar year in accordance with the compliance schedule in 326 IAC 2-6-3. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source was constructed after December 13, 1985 and has potential fugitive particulate emissions of twenty-five (25) tons per year or more. Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan that is included as Attachment A to the permit.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Clay County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Clay County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

EU-02

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
326 IAC 6-3-2 does not apply to the pre-kiln clay/shale/fireclay/sand processing operation (EU-02) if the limitation established in the rule is not consistent with applicable limitations in 40 CFR 60, Subpart OOO pursuant to 326 IAC 12. Since EU-02 is enclosed in a building and its emissions do not pass through a vent (as defined in 40 CFR 60.671), there are no applicable PM limits established by Subpart OOO. Therefore, EU-02 is subject to the requirements of 326 IAC 6-3-2.

Primary Crusher, Grinding and Scalping Screen Operation, Secondary Crusher, Finishing Screen Operation, Pugmill, Extrusion Operation, Brick Dryer, Tunnel Kiln, and Lime Storage Silo - Receiving, Bicarbonate Storage Silo - Receiving

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Primary Crusher, Grinding and Scalping Screen Operation, Secondary Crusher, Finishing Screen Operation, Pugmill, Extrusion Operation, Brick Dryer, Tunnel Kiln, and Lime Storage Silo - Receiving, and Bicarbonate Storage Silo - Receiving shall not exceed the allowable particulate emissions when operating at a maximum process weight rate specified in the table below. The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

Summary of Process Weight Rate Limits			
Process / Emission Unit	**P (ton/hr)**	**E (lb/hr)**	**Equation Used**
Primary Crusher	125	53.55	$E = 55.0 P^{0.11} - 40$
Grinding and Scalping Screen Operation	125	53.55	$E = 55.0 P^{0.11} - 40$
Secondary Crusher	110	52.24	$E = 55.0 P^{0.11} - 40$
Finishing Screen Operation	110	52.24	$E = 55.0 P^{0.11} - 40$
Pugmill	60	46.29	$E = 55.0 P^{0.11} - 40$
Extrusion Operation	60	46.29	$E = 55.0 P^{0.11} - 40$
Brick Dryer	10	19.18	$E = 4.10 P^{0.67}$
Tunnel Kiln	10	19.18	$E = 4.10 P^{0.67}$
Lime Storage Silo - Receiving	25	35.43	$E = 4.10 P^{0.67}$
Bicarbonate Storage Silo - Receiving	25	35.43	$E = 4.10 P^{0.67}$

The following facilities are capable of complying with these particulate limits without the use of control devices: primary crushing, grinding and scalping screen operation, secondary crushing, finishing screen operation, pugmill, extrusion operation, brick dryer, and tunnel kiln.

The dry injection fabric filter (DIFF) shall be in operation at all times the lime storage silo and/or the sodium bicarbonate storage silo are being loaded, in order to comply with these particulate limits.

Natural Gas-Fired Kiln

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
This emission unit is subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit sulfur dioxide (SO2) equal to or greater than 25 tons per year or 10 pounds per hour.

(a) There are no limits under this rule for natural gas combustion or for non-combustion sources of sulfur dioxide.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The natural gas-fired kiln unit is not subject to the requirements of 326 IAC 8-1-6 because it was constructed before January 1, 1980.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to the natural gas-fired kiln unit, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The requirements of 326 IAC 10-3 do not apply to the natural gas-fired kiln unit, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Lime Silo - Dispensing

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the lime silo-dispensing is not subject to the requirements of 326 IAC 6-3, since it's a manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Bicarbonate Silo - Dispensing

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the bicarbonate silo-dispensing is not subject to the requirements of 326 IAC 6-3, since it's a manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Additive Feeder

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the additive feeder is not subject to the requirements of 326 IAC 6-3, since it's a manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Surge Bin

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the lime surge bin is not subject to the requirements of 326 IAC 6-3, since it's a manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Texture Feeder

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the texture feeder is not subject to the requirements of 326 IAC 6-3, since it's a manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Packaging Area

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the packaging area is not subject to the requirements of 326 IAC 6-3, since it's a manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Space Heaters

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)
The packaging area is not subject to the provision of 326 IAC 6-2-4, since the space heater fires direct heat.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired combustion units are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The space heater is not subject to the requirements of 326 IAC 8-1-6 because it was constructed before January 1, 1980.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to the space heater, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The requirements of 326 IAC 10-3 do not apply to the space heater, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

(a) The Compliance Determination Requirements applicable to this source are as follows:

(a) The brick manufacturing line has applicable compliance determination conditions as specified below:

(1) Emissions Control

(a) The dry injection fabric filter (DIFF) for particulate control shall be in operation and control emissions from the lime silo and sodium bicarbonate silo at all times that either of the silos are being loaded.

(b) The dry injection fabric filter (DIFF) for total Fluoride control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

(c) The dry injection fabric filter (DIFF) for SO_2 and HF control shall be in operation and control emissions from the tunnel kiln at all times that the tunnel kiln is in operation, except for a maximum of 125 hours per twelve (12) consecutive month period during which the DIFF may be bypassed (for routine maintenance).

Testing Requirements:

Summary of Testing Requirements					
Emission Unit	**Control Device**	**Timeframe for Testing or Date of Initial Valid Demonstration)**	**Pollutant/ Parameter**	**Frequency of Testing**	**Authority**
Tunnel Kiln	DIFF	No later than 5 years from latest valid test	SO2, HF	Once every 5 years	326 IAC 3-6

Last tested on August 24, 2016.

The Permittee shall determine compliance with the SO2 limitations using the following equation:

$E_{TOTAL} = E_{CEMS} + [(C \times EF_{DIFF} \times H_{DIFF} / 2000) + (C \times EF_{NON\text{-}DIFF} \times H_{NON\text{-}DIFF} / 2000)]$

The above equation allows the Permittee to demonstrate compliance through a combination of CEMS data, test data (when the DIFF is in use), and sulfur sampling data (when the Diff is not in use).

(A) Sampling and analyzing the aggregate feedstock by using the following procedures:

(i) The aggregate sample acquisition point shall be at a location where representative samples of the feedstock to be consumed by the facility may be obtained;

(ii) The aggregate shall be sampled at least one (1) time per day;

(iii) Minimum sample size shall be five hundred (500) grams;

(iv) Samples shall be composited and analyzed at the end of each calendar quarter;

(v) Sulfur content analysis shall be determined by an independent laboratory; or

(B) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the tunnel kiln, using 40 CFR 60, Appendix A, Method 6, which is conducted with such frequency as to generate the amount of information required by (a) above.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

(4) The Permittee shall determine compliance with the HF limitations using the following equation:

$E_{TOTAL} = E_{CEMS} + [(C \times EF_{DIFF} \times H_{DIFF} / 2000) + (C \times EF_{NON\text{-}DIFF} \times H_{NON\text{-}DIFF} / 2000)]$

The above equation allows the Permittee to demonstrate compliance through a combination of CEMS data and test data (when the DIFF is and is not in use).

(b) The Compliance Monitoring Requirements applicable to this source are as follows:

Control Device	Type of Parametric Monitoring	Frequency	Range or Specification
DIFF - PM, PM10, PM2.5, and total Fluorides	Water Pressure Drop	Daily	1 to 7 inches
DIFF - SO2 and HF	Either CEMS or the following 4 parameters	Continuous	SO2 and HF emissions
	Lime Feed Rate		above 12% motor output speed or rate established in last test
	Sodium Bicarbonate Feed Rate		above 11% motor output speed or rate established in last test
	Inspect Dry Lime Feed System and Feed Quantity	Daily	Feed Rate at or above 12% established in last test and system functioning properly
	Inspect Dry Sodium Bicarbonate Feed System and Feed Quantity		

These monitoring conditions are necessary because the DIFF for the tunnel kiln, lime silo, and sodium bicarbonate silo must operate properly to assure compliance with 326 IAC 2-2 (PSD Minor), 326 IAC 2-4.1 (HAP Minor), 40 CFR 63.1 (HAP Area Source), 326 IAC 6-3 (Process Operations), 40 CFR 64 (CAM), and 326 IAC 2-7 (Part 70).

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 27, 2020.

The operation of this brick manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Operating Permit Renewal No. 021-42808-00054.

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Andrea C. Smith, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-6543 or (800) 451-6027, and ask for Andrea C. Smith or (317) 234-6543.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Appendix A: Emission Calculations
Emissions Summary

Company Name: Brickcraft, Inc.
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Title V Operating Permit No: T021-42808-00054
Source ID No.: 021-00054
Reviewer: Andrea C. Smith

Uncontrolled Potential to Emit (tons/year)

Emission Units	PM	PM_{10}	$PM_{2.5}$*	SO_2	NO_x	VOC	CO	Total Fluorides	HF	HCl	Total HAPs
EU-02	220.44	75.14	75.14	-	-	-	-	-	-	-	-
Brick Dryer	3.37	8.19	8.19	-	-	1.31	-	-	-	-	-
Natural Gas-Fired Kiln	16.21	38.11	38.11	1095.00	15.33	1.05	52.56	25.84	16.21	7.45	24.65
Lime Silo - Receiving	343.83	120.45	120.45	-	-	-	-	-	-	-	-
Lime Silo - Dispensing	0.01	2.51E-03	2.51E-03	-	-	-	-	-	-	-	-
Bicarbonate Silo - Receiving	343.83	120.45	120.45	-	-	-	-	-	-	-	-
Bicarbonate Silo - Dispensing	3.58E-03	1.31E-03	1.31E-03	-	-	-	-	-	-	-	-
Additive Feeder	0.08	0.03	0.03	-	-	-	-	-	-	-	-
Surge Bin	0.26	0.10	0.10	-	-	-	-	-	-	-	-
Texture Feeder	3.29E-03	1.20E-03	1.20E-03	-	-	-	-	-	-	-	-
Packaging Area	0.50	0.18	0.18	-	-	-	-	-	-	-	-
Space Heaters	0.04	0.17	0.17	0.01	2.19	0.12	1.84	-	-	-	0.04
Total	**928.58**	**362.82**	**362.82**	**1095.01**	**17.52**	**2.49**	**54.40**	**25.84**	**16.21**	**7.45**	**24.70**

** PM2.5 listed is direct PM2.5*

Potential to Emit After Control (tons/year)

Emission Units	PM	PM_{10}	$PM_{2.5}$*	SO_2	NO_x	VOC	CO	Total Fluorides	HF	HCl	Total HAPs
EU-02	23.84	21.03	21.03	-	-	-	-	-	-	-	-
Brick Dryer	3.37	8.19	8.19	-	-	1.31	-	-	-	-	-
Natural Gas-Fired Kiln	8.10	19.05	19.05	249.20	15.33	1.05	52.56	23.25	9.73	4.47	15.20
Lime Silo - Receiving	0.97	0.54	0.54	-	-	-	-	-	-	-	-
Lime Silo - Dispensing	6.84E-05	2.51E-05	2.51E-05	-	-	-	-	-	-	-	-
Bicarbonate Silo - Receiving	0.97	0.54	0.54	-	-	-	-	-	-	-	-
Bicarbonate Silo - Dispensing	3.58E-05	1.31E-05	1.31E-05	-	-	-	-	-	-	-	-
Additive Feeder	7.88E-04	2.89E-04	2.89E-04	-	-	-	-	-	-	-	-
Surge Bin	2.63E-03	9.64E-04	9.64E-04	-	-	-	-	-	-	-	-
Texture Feeder	3.29E-05	1.20E-05	1.20E-05	-	-	-	-	-	-	-	-
Packaging Area	4.99E-03	1.83E-03	1.83E-03	-	-	-	-	-	-	-	-
Space Heaters	0.04	0.17	0.17	0.01	2.19	0.12	1.84	-	-	-	0.04
Total	**37.31**	**49.52**	**49.52**	**249.21**	**17.52**	**2.49**	**54.40**	**23.25**	**9.73**	**4.47**	**15.24**

** PM2.5 listed is direct PM2.5*

Potential to Emit After Issuance (tons/year)

Emission Units	PM	PM_{10}	$PM_{2.5}$*	SO_2	NO_x	VOC	CO	Total Fluorides	HF	HCl	Total HAPs
EU-02	220.44	75.14	75.14	-	-	-	-	-	-	-	-
Brick Dryer	3.37	8.19	8.19	-	-	1.31	-	-	-	-	-
Units Controlled by DIFF - Natural Gas-Fired Kiln, Lime Silo, Bicarbonate Silo	21.90	153.30	153.30	249.00	15.33	1.05	52.56	23.25	9.99	7.45	18.44
					-	-	-			-	-
					-	-	-			-	-
					-	-	-			-	-
					-	-	-			-	-
Additive Feeder	0.08	0.03	0.03	-	-	-	-	-	-	-	-
Surge Bin	0.26	0.10	0.10	-	-	-	-	-	-	-	-
Texture Feeder	3.29E-03	1.20E-03	1.20E-03	-	-	-	-	-	-	-	-
Packaging Area	0.50	0.18	0.18	-	-	-	-	-	-	-	-
Space Heaters	0.04	0.17	0.17	0.01	2.19	0.12	1.84	-	-	-	0.04
Total	**246.60**	**237.11**	**237.11**	**249.01**	**17.52**	**2.49**	**54.40**	**23.25**	**9.99**	**7.45**	**18.48**

** PM2.5 listed is direct PM2.5*

Note: The shaded cells indicate where limits are included.

***The Permittee agrees fugitive PM emissions are greater than 25 tpy. Therefore, no calculations were done for fugitive emissions.*

Appendix A: Emission Calculations
Pre-Kiln Clay/Shale/Fireclay/Sand Processing Operation (EU-02)
Company Name: Brickcraft, Inc.
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Title V Operating Permit No: T021-42808-00054
Source ID No.: 021-00054
Reviewer: Andrea C. Smith

Unit Description	Throughput (tons/hr)	Uncontrolled EF (lb/ton)			Baghouse ID	Control Efficiency(%)	Controlled EF (lb/ton)			Potential to Emit (tpy)			Controlled Emissions (tpy)		
		PM	PM10	PM2.5			PM	PM10	PM2.5	PM	PM10	PM2.5	PM	PM10	PM2.5
Primary Crusher	125	0.0054	0.00240	0.00240	BH-1	0.0%	-	-	-	2.96	1.31	1.31	2.96	1.31	1.31
Transfer Conveyor	125	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	1.64	0.60	0.60	1.64E-02	6.02E-03	6.02E-03
Grinding & Scalping Screen	125	0.025	0.0023	0.0023	BH-1	99.0%	-	-	-	13.69	1.26	1.26	0.14	1.26E-02	1.26E-02
Coarse Material Return Conveyor	125	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	1.64	0.60	0.60	1.64E-02	6.02E-03	6.02E-03
Transfer Conveyor	125	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	1.64	0.60	0.60	1.64E-02	6.02E-03	6.02E-03
Secondary Crusher	110	0.0054	0.00240	0.00240	BH-1	99.0%	0.0012	0.00054	0.00054	2.60	1.16	1.16	0.00	0.26	0.26
Transfer Conveyor	110	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	1.45	0.53	0.53	1.45E-02	5.30E-03	5.30E-03
Finishing Screen Operation	110	0.025	0.0087	0.0087	BH-1	99.0%	-	-	-	12.05	4.19	4.19	0.12	0.04	0.04
Coarse Material Return Conveyor	110	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	1.45	0.53	0.53	1.45E-02	5.30E-03	5.30E-03
Transfer Conveyor	70	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	0.92	0.34	0.34	9.20E-03	3.37E-03	3.37E-03
Transfer Conveyor	70	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	0.92	0.34	0.34	9.20E-03	3.37E-03	3.37E-03
Crushed Material Storage Bin	100	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	1.31	0.48	0.48	1.31E-02	4.82E-03	4.82E-03
Crushed Material Storage Bin	100	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	1.31	0.48	0.48	1.31E-02	4.82E-03	4.82E-03
Crushed Material Storage Bin	100	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	1.31	0.48	0.48	1.31E-02	4.82E-03	4.82E-03
Crushed Material Storage Bin	100	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	1.31	0.48	0.48	1.31E-02	4.82E-03	4.82E-03
Crushed Material Storage Bin	100	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	1.31	0.48	0.48	1.31E-02	4.82E-03	4.82E-03
Crushed Material Storage Bin	100	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	1.31	0.48	0.48	1.31E-02	4.82E-03	4.82E-03
Transfer Conveyor	60	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	0.79	0.29	0.29	7.88E-03	2.89E-03	2.89E-03
Transfer Conveyor	60	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	0.79	0.29	0.29	7.88E-03	2.89E-03	2.89E-03
Pugmill	60	0.572	0.156	0.156	BH-2	99.0%	-	-	-	150.32	41.00	41.00	1.50	0.41	0.41
Transfer Conveyor	60	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	0.79	0.29	0.29	7.88E-03	2.89E-03	2.89E-03
Extrusion Operation*	60	-	-	-	NA	95.0%	0.0036	0.0036	0.0036	18.92	18.92	18.92	18.92	18.92	18.92
Insignificant Activites															
Additive Feeder	6	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	0.08	0.03	0.03	7.88E-04	2.89E-04	2.89E-04
Surge Bin	20	0.003	0.0011	0.0011	BH-1	99.0%	-	-	-	0.26	0.10	0.10	2.63E-03	9.64E-04	9.64E-04
Texture Feeder	0.25	0.003	0.0011	0.0011	BH-2	99.0%	-	-	-	3.29E-03	1.20E-03	1.20E-03	3.29E-05	1.20E-05	1.20E-05
Packaging Area	38	0.003	0.0011	0.0011	BH-2	99.0%	-	-	-	0.50	0.18	0.18	4.99E-03	1.83E-03	1.83E-03
									Total	**221.29**	**75.45**	**75.45**	**23.85**	**21.04**	**21.04**

Methodology
Source of Emission Factors: AP-42 Table 11.3-2, Table 11.19.2-2, and Table 11.12-2
Uncontrolled Emissions (tpy) = Rate (tons/hr) x Emission Factor (lb/ton) x 8760 (hr/yr) / 2000 lb/ton)
Controlled Emissions (tpy) = Rate (tons/hr) x Controlled Emission Factor (lb/ton) x 8760 (hr/yr) / 2000 lb/ton)
Controlled Emissions (tpy) = Uncontrolled Emissions (tpy) x (1 - Control Efficiency %)
*There is only a controlled EF for this operation, therefore: Uncontrolled Emissions (tpy) = Rate (tons/yr) x Controlled Emission Factor (lb/ton) x 8760 (hr/yr) / 2000 (lb/ton) / (1 - Control Efficiceny%)

Appendix A: Emission Calculations
Brick Dryer

Company Name: Brickcraft, Inc.
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Title V Operating Permit No: T021-42808-00054
Source ID No.: 021-00054
Reviewer: Andrea C. Smith

Process:	Rate (tons/hr)	Pollutant	Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Brick Dryer	10.00	PM	0.077	3.37	none	0.0	3.37
		PM_{10}	0.187	8.19	none	0.0	8.19
Source of Criteria		$PM_{2.5}$	0.187	8.19	none	0.0	8.19
Pollutant Factors:		SO_2	*see note	0.00	none	0.0	0.00
SCC# 3-05-003-50		NO_x	*see note	0.00	none	0.0	0.00
AP-42 Ch. 11.3		VOC	0.03	1.31	none	0.0	1.31
		CO	*see note	0.00	none	0.0	0.00
		fluorides	*see note	0.00	none	0.0	0.00
		HF	*see note	0.00	none	0.0	0.00
		HCl	*see note	0.00	none	0.0	0.00
		total HAPs	*see note	0.00	none	0.0	0.00

* Dryer is heated with waste heat from the cooling zone of the kiln. Per AP-42 Ch. 11.3, these emissions are accounted for in the Kiln.

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 10.00 tons/hr
limit = 4.1 x (10.00 ^0.67) = 19.18 lb/hr (allowable)

with uncontrolled potential:
3.37 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.77 lb/hr (capable of complying)

Methodology:
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Appendix A: Emission Calculations
Natural Gas-Fired Kiln

Company Name: Brickcraft, Inc.
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Title V Operating Permit No: T021-42808-00054
Source ID No.: 021-00054
Reviewer: Andrea C. Smith

Process:	Rate (tons/hr)	Pollutant	Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Natural Gas-Fired Kiln	10.00	PM	0.37	16.21	DIFF	50.0	8.10
(with no back-up fuel)		PM_{10}	0.87	38.11	DIFF	50.0	19.05
		$PM_{2.5}$	0.87	38.11	DIFF	50.0	19.05
Source of Criteria		SO_2	25.00	1095.00	DIFF	* see below	249.20
Pollutant Factors:		NO_x	0.35	15.33	none	0.0	15.33
SCC# 3-05-003-11		VOC	0.024	1.05	none	0.0	1.05
AP-42 Ch. 11.3		CO	1.2	52.56	none	0.0	52.56
		fluorides	0.59	25.84	DIFF	* see below	23.25
		HF	0.37	16.21	DIFF	* see below	9.73
		HCl	0.17	7.45	DIFF	40.0	4.47
		total HAPs	--	24.65	DIFF	40.0	15.20

SO_2 emissions when bypassing the dry injection fabric filter (DIFF):
(10.00 tons/hr) x (25.00 lb/ton) x (125 hr/yr) x (1 ton/2000 lb) = 15.63 tpy
SO_2 emissions controlled by the dry injection fabric filter (DIFF):
(10.00 tons/hr) x (5.41 lb/ton) x (8635 hr/yr) x (1 ton/2000 lb) = 233.58 tpy
249.20 tpy

Total Fluorides emissions when bypassing the dry injection fabric filter (DIFF):
(10.00 tons/hr) x (0.59 lb/ton) x (125 hr/yr) x (1 ton/2000 lb) = 0.37 tpy
HF emissions controlled by the dry injection fabric filter (DIFF):
(10.00 tons/hr) x (0.53 lb/ton) x (8635 hr/yr) x (1 ton/2000 lb) = 22.88 tpy
23.25 tpy

(25.84 - 23.25) ÷ 25.84 x 100 = 10.0 % CE

HF emissions when bypassing the dry injection fabric filter (DIFF):
(10.00 tons/hr) x (0.37 lb/ton) x (125 hr/yr) x (1 ton/2000 lb) = 0.23 tpy
HF emissions controlled by the dry injection fabric filter (DIFF):
(10.00 tons/hr) x (0.22 lb/ton) x (8635 hr/yr) x (1 ton/2000 lb) = 9.50 tpy
9.73 tpy

(16.21 - 9.73) ÷ 16.21 x 100 = 40.0 % CE

Allowable Emissions:
The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 10.00 tons/hr
limit = 4.1 x (10.00 ^0.67) = 19.18 lb/hr (allowable)

with uncontrolled potential:
16.21 tons/yr x 2000 lb/ton / 8760 hr/yr = 3.70 lb/hr (capable of complying)

Methodology:
Emission factor for SO_2 is from mass balance using worse case material while keeping the source below 250 tpy after control.
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Appendix A: Emission Calculations
Natural Gas-Fired Kiln

Company Name: Brickcraft, Inc.
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Title V Operating Permit No: T021-42808-00054
Source ID No.: 021-00054
Reviewer: Andrea C. Smith

Process:	Rate (tons/hr)	Pollutant	Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)
Natural Gas-Fired Kiln	10.00	1,1,1-Trichloroethane	4.70E-06	2.06E-04
		1,4-dichlorobenzene	4.80E-05	2.10E-03
		2-methylnaphthalene	5.70E-05	2.50E-03
		Benzene	2.90E-03	1.27E-01
		Bis(2-ethylhexy)phthalate	2.00E-03	8.76E-02
		Carbon disulfide	4.30E-05	1.88E-03
		Chlorine	1.30E-03	5.69E-02
		Chloroethande	5.70E-04	2.50E-02
		Chloromethane	6.70E-04	2.93E-02
		Di-n-butylphthalate	1.40E-04	6.13E-03
		Ethylbenzene	4.40E-05	1.93E-03
		M-/p-Xylene	6.70E-05	2.93E-03
		Iodomethane	9.30E-05	4.07E-03
		Naphthalene	6.50E-05	2.85E-03
		o-Xylene	5.80E-05	2.54E-03
		Phenol	8.60E-05	3.77E-03
		Styrene	2.00E-05	8.76E-04
		Tetrachloroethene	2.80E-06	1.23E-04
		Toluene	1.60E-04	7.01E-03
		Antimony	2.70E-05	1.18E-03
		Cadminium	1.50E-05	6.57E-04
		Chromium	5.10E-05	2.23E-03
		Cobalt	2.10E-06	9.20E-05
		Lead	1.50E-04	6.57E-03
		Nickel	7.20E-05	3.15E-03
		Selenium	2.30E-04	1.01E-02
		Aresenic	3.10E-05	1.36E-03
		Beryllium	4.20E-07	1.84E-05
		Manganese	1.30E-02	5.69E-01
		Mercury	7.50E-06	3.29E-04
		Phosphorus	9.80E-04	4.29E-02
			Total	**1.00**

Methodology
Source of Emission Factors: AP-42 Ch. 11.3 SCC# 3-05-003-11
Uncontrolled Emissions (tpy) = Rate (tons/hr) x Emission Factor (lb/ton) x 8760 (hr/yr) / 2000 lb/ton)

Appendix A: Emission Calculations
One (1) Storage Silo - Powdered Lime - Receiving

Company Name: Brickcraft, Inc.
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Title V Operating Permit No: T021-42808-00054
Source ID No.: 021-00054
Reviewer: Andrea C. Smith

1. Process Descriptions:

The lime is delivered via tank trucks, and the silo is filled pneumatically.
The DIFF is used to equalize the pressure and to prevent material from being emitted to the atmosphere.

Max Throughput: 25.0 tons/hr

Uncontrolled Emission Factors		Controlled Emission Factors	
PM Emission Factor:	3.14 lbs/ton	PM Emission Factor:	0.0089 lbs/ton
PM_{10} Emission Factor:	1.10 lbs/ton	PM_{10} Emission Factor:	0.0049 lbs/ton
$PM_{2.5}$ Emission Factor:	1.10 lbs/ton	$PM_{2.5}$ Emission Factor:	0.0049 lbs/ton

Emission Factors are from AP-42, Tables 11.12-2, SCC #3-05-011-17
(Cement supplement unloading to elevated storage silo (pneumatic), AP-42, 06/06).
$PM_{2.5}$ has been assumed equal to PM_{10}.
There is no emission factor for lime loading in AP-42.

2. Potential Uncontrolled Emissions:

Unit	Throughput (tons/hr)	Emissions PM (tons/yr)	Emissions PM_{10} (tons/yr)	Emissions $PM_{2.5}$ (tons/yr)
1 Silo	25.0	343.83	120.45	120.45

3. Controlled Emissions:

Unit	Throughput (tons/hr)	Emissions PM (tons/yr)	Emissions PM_{10} (tons/yr)	Emissions $PM_{2.5}$ (tons/yr)
1 Silo	25.0	0.97	0.54	0.54

4. Limited Emissions:

PM emissions controlled by the dry injection fabric filter (DIFF):
(25.0 tons/hr) x (0.200 lb/ton) x (8760 hr/yr) x (1 ton/2000 lb) = 21.90 tpy
(25.0 tons/hr) x (0.200 lb/ton) = 5.00 lb/hr

PM_{10} and $PM_{2.5}$ emissions controlled by the dry injection fabric filter (DIFF):
(25.0 tons/hr) x (0.704 lb/ton) x (8760 hr/yr) x (1 ton/2000 lb) = 77.09 tpy
(25.0 tons/hr) x (0.704 lb/ton) = 17.60 lb/hr

5. Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 25 tons/hr
limit = 4.1 x (25 ^0.67) = 35.4 lb/hr (allowable)

with uncontrolled potential:
343.83 tons/yr x 2000 lb/ton / 8760 hr/yr = 78.50 lb/hr (will not comply)

with controlled potential:
0.97 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.22 lb/hr (capable of complying)

Methodology
Emissions (tons/yr) = Throughput (tons/hr) * Emission Factor (lb/ton) * 8760 hr/yr ÷ 2000 lb/ton

Appendix A: Emission Calculations
One (1) Storage Silo - Powdered Lime - Dispensing

Company Name: Brickcraft, Inc.
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Title V Operating Permit No: T021-42808-00054
Source ID No.: 021-00054
Reviewer: Andrea C. Smith

Max Throughput: 1042 lb/hr

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Lime Dispensing/Injecting	0.521	PM	0.003	0.01	DIFF	99.0	6.84E-05
		PM_{10}	0.0011	2.51E-03	DIFF	99.0	2.51E-05
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0011	2.51E-03	DIFF	99.0	2.51E-05
*SCC# 3-05-020-06**, AP-42, Ch. 11.19, Table 11.19.2-2*							

**Use uncontrolled conveyor transfer point emission factors

Methodology:
Maximum Throughput (125 lb/hr using 12% motor output) = 125 lb/hr ÷ 0.12 = 1042 lb/hr
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Allowable Emissions:
The lime dispensing system is exempt from 326 IAC 6-3-2 because the system has potential emissions less than 0.551 lb/hr.

0.521 tons/hr x 0.003 lb/ton = 0.002 lb/hr

Appendix A: Emission Calculations
One (1) Storage Silo - Sodium Bicarbonate - Receiving

Company Name: Brickcraft, Inc.
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Title V Operating Permit No: T021-42808-00054
Source ID No.: 021-00054
Reviewer: Andrea C. Smith

1. Process Descriptions:

The sodium bicarbonate is delivered via tank trucks, and the silo is filled pneumatically.
The DIFF is used to equalize the pressure and to prevent material from being emitted to the atmosphere.

Max Throughput: 25.0 tons/hr

Uncontrolled Emission Factors		Controlled Emission Factors	
PM Emission Factor:	**3.14 lbs/ton**	**PM Emission Factor:**	**0.0089 lbs/ton**
PM_{10} Emission Factor:	**1.10 lbs/ton**	**PM_{10} Emission Factor:**	**0.0049 lbs/ton**
$PM_{2.5}$ Emission Factor:	**1.10 lbs/ton**	**$PM_{2.5}$ Emission Factor:**	**0.0049 lbs/ton**

Emission Factors are from AP-42, Tables 11.12-2, SCC #3-05-011-17
(Cement supplement unloading to elevated storage silo (pneumatic), AP-42, 06/06).
$PM_{2.5}$ has been assumed equal to PM_{10}.
There is no emission factor for sodium bicarbonate loading in AP-42.

2. Potential Uncontrolled Emissions:

Unit	Throughput (tons/hr)	Emissions PM (tons/yr)	Emissions PM_{10} (tons/yr)	Emissions $PM_{2.5}$ (tons/yr)
1 Silo	25	343.83	120.45	120.45

3. Controlled Emissions:

Unit	Throughput (tons/hr)	Emissions PM (tons/yr)	Emissions PM_{10} (tons/yr)	Emissions $PM_{2.5}$ (tons/yr)
1 Silo	25	0.97	0.54	0.54

4. Limited Emissions:

PM emissions controlled by the dry injection fabric filter (DIFF):
(25.0 tons/hr) x (0.200 lb/ton) x (8760 hr/yr) x (1 ton/2000 lb) = 21.90 tpy
(25.0 tons/hr) x (0.200 lb/ton) = 5.00 lb/hr

PM_{10} and $PM_{2.5}$ emissions controlled by the dry injection fabric filter (DIFF):
(25.0 tons/hr) x (0.704 lb/ton) x (8760 hr/yr) x (1 ton/2000 lb) = 77.09 tpy
(25.0 tons/hr) x (0.704 lb/ton) = 17.60 lb/hr

5. Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 25 tons/hr
limit = 4.1 x (25 ^0.67) = 35.4 lb/hr (allowable)

with uncontrolled potential:
343.83 tons/yr x 2000 lb/ton / 8760 hr/yr = 78.50 lb/hr (will not comply)

with controlled potential:
0.97 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.22 lb/hr (capable of complying)

Methodology
Emissions (tons/yr) = Throughput (tons/hr) * Emission Factor (lb/ton) * 8760 hr/yr ÷ 2000 lb/ton

Appendix A: Emission Calculations
One (1) Injection System - Sodium Bicarbonate - Dispensing

Company Name: Brickcraft, Inc.
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Title V Operating Permit No: T021-42808-00054
Source ID No.: 021-00054
Reviewer: Andrea C. Smith

Max Throughput: 545 lb/hr

Process:	Rate (tons/hr)	Pollutant	Uncontrolled Emission Factor (lb/ton)	Uncontrolled Emissions (tons/yr)	Type of Control	Control Eff. (%)	Controlled Emissions (tons/yr)
Sodium Bicarbonate Dispensing/Injecting	0.273	PM	0.003	3.58E-03	DIFF	99.0	3.58E-05
		PM_{10}	0.0011	1.31E-03	DIFF	99.0	1.31E-05
Source of Criteria Pollutant Factors:		$PM_{2.5}$	0.0011	1.31E-03	DIFF	99.0	1.31E-05
*SCC# 3-05-020-06**, AP-42, Ch. 11.19, Table 11.19.2-2*							

**Use uncontrolled conveyor transfer point emission factors

Methodology:
Maximum Throughput (60 lb/hr using 11% motor output) = 60 lb/hr ÷ 0.11 = 545 lb/hr
Uncontrolled Emissions (tons/yr) = Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hrs/yr ÷ 2000 lbs/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) x (1 - Control Efficiency/100)

Allowable Emissions:
The bicarbonate dispensing system is exempt from 326 IAC 6-3-2 because the system has potential emissions less than 0.551 lb/hr.

0.273 tons/hr x 0.003 lb/ton = 0.001 lb/hr

Appendix A: Emissions Calculations
Natural Gas Combustion Only (MMBtu/hr <100)

Company Name: Brickcraft, Inc.
Address City IN Zip: 200 North SR 59, Center Point, IN 47840
Title V Operating Permit No: T021-42808-00054
Source ID No.: 021-00054
Reviewer: Andrea C. Smith

Combined Heat Input Capacity MMBtu/hr	Potential Throughput MMcf/yr
5.1	43.8

	Pollutant						
	PM*	PM_{10}*	$PM_{2.5}$*	SO_2	NO_x	VOC	CO
Emission Factor in lb/MMcf	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emissions in tons/yr	0.04	0.17	0.17	0.01	2.19	0.12	1.84

* PM emission factor is filterable PM only. PM_{10} emission factor is filterable and condensable PM_{10} combined.

** Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emissions in tons/yr	4.599E-05	2.628E-05	1.643E-03	3.942E-02	7.446E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emissions in tons/yr	1.095E-05	2.409E-05	3.066E-05	8.322E-06	4.599E-05

Single HAP	**0.04**
Total HAP	**0.04**

Methodology:
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMcf = 1,000,000 cubic feet of gas
Emission factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (Supplement D 3/98).
Potential Throughput (MMcf/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMcf/1,020 MMBtu
Potential Emissions (tons/yr) = Throughput (MMcf/yr) x Emission Factor (lb/MMcf) ÷ 2,000 lb/ton

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 9, 2020

Mr. Bob McIntosh
BrickCraft, Inc.
200 North State Road 59
Center Point, Indiana 47840

Re: Public Notice
BrickCraft, Inc.
Permit Level: Title V Renewal
Permit Number: 021-42808-00054

Dear Mr. McIntosh:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, **are available electronically at**:

IDEM's online searchable database: http://www.in.gov/apps/idem/caats/ . Choose Search Option **by Permit Number**, then enter permit 42808

and

IDEM's Virtual File Cabinet (VFC): http://www.IN.gov/idem. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Clay County Genealogy Library, 309 Main Street in Center Point, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Ms. Andrea C. Smith, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6543 or dial (317) 234-6543.

Sincerely,

John F. Jackson

John F. Jackson
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 9, 2020

To: Clay County Genealogy Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: BrickCraft, Inc.
Permit Number: 021-42808-00054

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

September 9, 2020
BrickCraft, Inc.
021-42808-00054

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM's Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover Letter 2/28/2020

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Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

September 9, 2020

A 30-day public comment period has been initiated for:

Permit Number: **021-42808-00054**
Applicant Name: **BrickCraft, Inc.**
Location: **Center Point, Clay County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Mail Code 61-53

IDEM Staff	JJACKSON 9/9/2020 BrickCraft Inc 021-42808-00054 (DRAFT)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Bob McIntosh BrickCraft Inc 200 N SR 59 Center Point IN 47840 (Source CAATS)									
2		William Halquist President BrickCraft Inc N51 W23563 Lisbon Rd Sussex WI 53089 *(RO CAATS)*									
3		Clay County Health Department 18 N Walnut Street Brazil IN 47834-2718 *(Health Department)*									
4		Center Point Town Council P.O. Box 177 Center Point IN 47840 *(Local Official)*									
5		Clay County Board of Commissioners 609 E. National St. Brazil IN 47834 *(Local Official)*									
6		Clay County Genealogy Library 309 East Main Street Center Point IN 47840 *(Library)*									
7		Mr. Mark Fitton Tribune-Star 222 S. 7th Street Terre Haute IN 47807 *(Affected Party)*									
8		Nathaniel Cullen Keramida Inc 401 N College Ave Indianapolis IN 46202 *(Consultant)*									
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